



# SAFETY-KLEEN SYSTEMS, INC. DOLTON RECYCLE CENTER



# ENVIRONMENTAL INFORMATION PACKAGE

633 EAST 138TH STREET

SAFETY-KLEEN SYSTEMS, INC. DOLTON, IL 60419-1058

(708) 225-8100

DOCUMENT # 4

#### **ENVIRONMENTAL INFORMATION PACKAGE**

#### SAFETY-KLEEN SYSTEMS, INC. DOLTON RECYCLE CENTER

(May 2003)

#### **FACILITY NAME AND LOCATION**

Facility Name:

Safety-Kleen Systems, Inc. Dolton Recycle Center

Location Address:

633 East 138th Street, Dolton, IL 60419

EPA ID #:

ILD 980 613 913

Facility Telephone:

(708) 225-8100

#### **CONTACTS**

Facility Manager:

Phillip Gover

Telephone:

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Facility Operations Manager:

William (Bill) Schade

Telephone:

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Environmental Manager:

Bob Burke, REM

Phone:

(708) 225-8155

#### **FACILITY OWNERSHIP**

The facility was originally constructed by Barker Chemical Company in 1950 as a paint solvent and lacquer thinner blending plant. McKesson Envirosystems Company acquired the site from Barker Chemical in 1981. Safety-Kleen acquired the site in 1987 from McKesson Envirosystems. Safety-Kleen Corp. merged with Laidlaw Environmental Services in 1998 and retained the Safety-Kleen Name. Prior to 1950, the facility property was utilized for residential purposes.

#### **FACILITY SIC CODE**

The primary Standard Industrial Classification Code for the Dolton Recycle Center is 4953. The secondary SIC codes are 7359 and 7389.

#### **DUN & BRADSTREET NUMBER**

The Dun & Bradstreet number for the facility is 05-106-0408.

#### OTHER SAFETY-KLEEN FACILITIES

Other recycle facilities operated by Safety-Kleen Systems, Inc. include:

Safety-Kleen Systems Chicago, IL

Safety-Kleen Systems Lexington, SC

EPA ID # ILD005450697

EPA ID # SCD077995488

Safety-Kleen Systems Denton, TX EPA ID # TXD077603371

Safety-Kleen Systems Linden, NJ

EPA ID # NJD002182897

Safety-Kleen Systems Co. PR Manati, PR EPA ID # PRD090399718 Safety-Kleen Systems Reedley, CA EPA ID # CAD093453485

Safety-Kleen Systems Hebron, OH EPA ID # OHD980587364 Safety-Kleen Systems Smithfield, KY EPA ID # KYD053348108

Safety-Kleen also owns and operates three oil re-refining plants at the following locations:

Safety-Kleen Canada Inc. Breslau, Ontario EPA ID # NYD981178569 Safety-Kleen Oil Recovery Co. East Chicago, IN EPA ID # IND077042034

Safety-Kleen Systems - Buffalo Oil Recovery Buffalo, NY EPA ID #NYD980593842

In addition, Safety-Kleen Systems, Inc. owns and operates the following fuel blending facilities which are the sole supplier of supplemental fuel used by the respective adjacent cement manufacturing plants for energy recovery:

Safety-Kleen Corp. - Artesia, MS Holnam/Safety-Kleen Corp. EPA ID #MSD077655876 Safety-Kleen Canada Inc.-St Constant RC Canada LaFarge/Safety-Kleen EPA ID #27011824

Safety-Kleen Corp. - Clarksville, MO Holnam/Safety-Kleen Corp. EPA ID #MOD029729688

Safety-Kleen also has a facility that handles only photo imaging waste.

Safety-Kleen Systems - Canton RC Canton, MA EPA ID #MAD982755639

#### **GENERAL DESCRIPTION**

The Safety-Kleen Dolton Recycle Center operates 24 hours per day, 7 days per week. The facility manages two significant lines of business for the company. The first is the solvent recovery operation. The solvent recovery capabilities include distillation/fractionation and evaporation equipment. Waste mineral spirits used in parts washing machines, immersion cleaner solvent, and lacquer thinner supplied with the paint gun cleaning machines are recycled for reuse by our customers. The residual distillation bottoms are blended into fuel for energy recovery.

The second is the fuel blending operation for materials that are not economically viable for solvent recovery, yet have value as an energy source. The blended fuel is shipped to various cement kilns for energy recovery. The fuel is blended to specifications established by the individual kilns. The fuel specification parameters typically include BTU content, chlorine, water content, metals, etc. The majority of the fuel produced by the Dolton facility is shipped to cement kilns in which Safety-Kleen operates a joint venture with the cement manufacturer. Approximately 90% of the fuel produced by the Dolton facility is shipped to the Holnam/Safety-Kleen cement kiln in Clarksville, Missouri. The remaining portion of the fuel is shipped to other kilns, typically also operated by Safety-Kleen.

The Dolton facility also manages the aqueous parts washing solutions supplied by the company. This includes the aqueous parts washing solution, brake cleaning solution, and paint gun cleaner solution. These waste streams are bulked up in tanks permitted for hazardous waste storage and can be either treated on-site using a nanofiltration process, or can be shipped off-site for treatment or disposal at another facility.

#### SITE PLAN

The Safety-Kleen Recycle Center site is located in the Village of Dolton on the south side of 138<sup>th</sup> Street. The facility is located within the limits of Cook County. The area surrounding the Dolton Recycle Center is comprised of light industrial, heavy industrial, and residential. The active portion of the property is made up of eight contiguous parcels of land that comprise approximately 30 acres. A copy of the facility's site plan is included as **Attachment 1.** The drawing shows the locations of buildings, structures, operation areas, security fencing and access gates.

#### **ZONING**

The facility is zoned as M-2, General Manufacturing. Immediately adjacent properties are zoned M-2, M-1, Limited Manufacturing, B-2, Business District Limited Retail, B-3, General Business, and R-4, Two Family Dwelling.

#### SURROUNDING FEATURES

The surrounding land is used for light industrial, heavy industrial, retail business and residential purposes.

#### MAJOR SURFACE WATER BODIES/DRAINAGE

The active portion of the plant is located on the south side of 138<sup>th</sup> Street. The Little Calumet River is located approximately ½ mile north of the facility. Lake Cottage Grove is located approximately 500 feet south of the southern part of the facility. Surface water is collected from various storm water drains located on the property. This water is

discharged to the sewer system managed by the Metropolitan Water Reclamation District of Greater Chicago (MWRDGC).

#### PROTECTIVE FEATURES

The facility is secured by various measures which include fencing, building enclosures, and limited access controls. A six foot high chain link fence with three strands of barbed wire completely surrounds the facility. Gates are locked at all times and access is allowed only after registering in the facility offices. Warning signs are posted at all entrances to the facility and additional locations visible from any approach to provide adequate notice of hazards.

The site is equipped with on-site communication and telephones for access to off-site assistance. Alarm systems for certain equipment, areas and storage tanks are maintained. The facility's contingency plan and emergency numbers are posted throughout the facility for quick response to any emergency events.

Fire and spill response and other safety equipment is located throughout the facility. Fire extinguishers are placed, marked and maintained at key locations. Spill and first aid stations on the site provide centralized access to tools, supplies and equipment for efficient emergency response. Emergency showers and eye wash stations are located in all process building and storage areas.

In addition to the above features, the following factors contribute to the facility's protective features:

- Night time lighting is provided throughout the facility.
- A salaried shift supervisor is on duty twenty-four hours per day every day of the year. The supervisor makes regular security patrols.

#### **FLOODPLAIN**

The facility is not located within a flood plain area. The Dolton Recycle Center is located in Zone C, designated as an area of minimal flooding, by the Federal Department of Housing.

#### **SEISMIC ZONE**

The Dolton facility is not located within 3,000 feet of a fault which has had displacement in Holocene time, or no lineations which suggest the presence of a fault.

#### WATER SUPPLY WELLS

There is only one potable water well used for domestic purposes that is located within the general vicinity of the facility. It is located approximately 1500 feet from the facility and was drilled to a depth of 210 feet. All of Cook County is serviced by a domestic water supply. The domestic water is supplied via Lake Michigan. Sanitary wastes are discharged on-site and are managed by the Metropolitan Water Reclamation District of Greater Chicago .

#### ENVIRONMENT, HEALTH AND SAFETY SUPPORT

The Dolton facility is staffed by two Environment, Health and Safety Managers, and one assistant. Safety-Kleen manages its health and safety programs as part of its commitment to environmental excellence. The programs are carried out by a dedicated staff of over 100 environmental, health and safety professionals who work with the operating and sales facilities to assure compliance with all applicable laws and regulations. Environmental personnel report to the Environmental Director of each Division. Health & Safety personnel report to the Health & Safety Director of each Division. Both Directors are independent of facility management. This reporting structure ensures an independent oversight of environmental, health and safety conditions at the facility is maintained.

In addition to the daily oversight of the facility, monthly audits are conducted and a comprehensive audit is performed at each facility once each year. These audits are conducted without prior notification to the facility. They cover environmental regulations, permit conditions, OSHA regulations, Company standards, process safety management, and employee training.

#### **OPERATIONS OVERVIEW**

The Dolton Recycle Center operates both as a solvent recycling operation and as a fuel blender. The fuel blending operation takes high BTU waste materials which have little or no solvent value and produces a specification fuel for cement kilns. As fuel costs are the most expensive component of cement manufacturing, this specification fuel is a valuable commodity.

Prior to shipment to the Dolton Recycle Center, each waste stream must be sampled and analyzed by Safety-Kleen under the Company's waste profiling program. After being approved through the waste stream profiling process, a shipment of material can be scheduled.

Bulk tanker truck shipments arriving at the facility are staged in one of the facility's tanker loading/unloading areas. A representative sample of the material is then obtained for analysis in the onsite laboratory. The results of the analysis are then compared with the profile analysis to ensure that the received material is approved. After sampling and analysis, the material is unloaded to an appropriate storage tank for processing.

Shipments of containers arriving at the facility from locations outside of the Chicago land area are stored at the facility's Container Storage Building # 1. Containers of waste that are accumulated through the two branches that operate on-site are staged in Container Building # 5. The paper work is matched up to the containers received and then consolidated for transfer to Container Storage Building # 1. Upon unloading into Building # 1, a representative sample is obtained from each container, excluding core waste streams, and composited with similar materials for analysis in the onsite laboratory. There are a maximum of 20 drums in each composite sample. The results of laboratory analysis are compared with the profiling analysis to ensure that the received material is approved. The receipt analyses include VOC content, PCB's, flash point and pH. During the sampling phase, the matrix of the material is also determined, i.e, solid or liquid. This information is utilized to determine the appropriate equipment to be used to process the material.

#### **MATERIAL PROCESSING**

The Dolton facility operates three (3) thin-film evaporators and one (1) fractional distillation column. These operations reclaim solvents for return to the various cleaning services Safety-Kleen offers our customers.

The facility also operates a drum shredder system that is an intricate part of the fuel blending operation. This system includes the drum shredder unit, a hydrapulper, and metal cleaning equipment. The drum shredder system is designed to process solids, liquids and sludges. Full containers of waste are shredded in a totally enclosed system purged with nitrogen. The material is then passed through a metal separation process where the ferrous material is removed for reclamation. Liquids, sludges, and applicable solids are directed to the hydrapulper for mixing prior to being transferred to a permitted hazardous waste storage tank on-site. Solid materials that cannot be converted into a liquid solution are transferred from the drum shredder unit to a bulk container (e.g., dump trailer) for shipment off-site. Hazardous waste streams are shipped to a cement kiln for energy recovery or an incinerator for thermal destruction. Non-hazardous waste streams may be sent to an industrial incinerator for energy recovery. Prior to the shredded drum metal being shipped off-site to various smelters, residual waste is removed from the scrap metal.

#### STORM WATER MANAGEMENT

The Dolton facility collects any storm water that falls into tank storage dikes, container storage areas, truck loading/unloading areas, etc. This water is evaluated to determine if the water can be discharged to the local POTW or requires treatment. Storm water collected by the separate storm water system maintained underneath the facility is discharged to the local POTW.

#### **CONTAINER STORAGE**

The facility currently has eleven (11) container storage areas permitted for the storage of hazardous waste. The total permitted storage capacity for these areas is 690,173 gallons (12,548, 55-gallon containers). The built storage capacity for these areas is 676,684 gallons (12,303, 55-gallon containers).

Provided below are the maximum storage capacities identified for each existing container storage building:

| a. | Storage # 1 -          | 187,000 gallons                       |
|----|------------------------|---------------------------------------|
| Ъ. | Storage # 2 -          | 54,780 gallons                        |
| c. | Storage # 3c -         | 66,000 gallons                        |
| đ. | Storage # 5 -          | 22,000 gallons                        |
| e. | South Field Liquids -  | 196,136 gallons                       |
| f. | South Fields Solids -  | 86,328 gallons (720 yd <sup>3</sup> ) |
| g. | Truck Station # 2C -   | 13,730 gallons                        |
| h. | Truck Station # 4 -    | 26,235 gallons                        |
| i. | Truck Station # 13 -   | 9,350 gallons                         |
| j. | Vacuum Container Pad - | 15,125 gallons                        |
| k. | Building # 5600 -      | 21,615 gallons                        |
|    |                        |                                       |
|    |                        | 690,173 gallons                       |

Containers arriving at the facility are typically unloaded into Container Storage Building # 1 where they are stored by material type and sampled. The containers remain in these area until the results of the laboratory analysis are received and the disposition of the material determined. This usually takes from 4 to 8 hours.

Following receipt of the laboratory analysis, material that is to be processed immediately is moved to the appropriate processing equipment. If it is not to be processed immediately, it is then moved to Container Storage Building # 2 or 3c.

#### TANK STORAGE

There are 104 aboveground tanks at the Dolton Recycle Center, 55 of which are permitted for storage of hazardous waste. There are no underground storage tanks. The total permitted tank storage capacity for hazardous waste is 1,328,720 gallons. The built storage capacity for existing permitted tanks is 750,910 gallons. Tanks at the facility are utilized to store a variety of materials which include:

- Blend and mix tanks
- Boiler fuel storage
- Wastewater storage
- Finished product storage

Provided below are the maximum storage capacities identified for each existing permitted hazardous waste tank farm:

| a. | Tank Farm # 4 (15 tanks) - | 225,000 gallons     |
|----|----------------------------|---------------------|
| b. | Tank Farm # 6 (13 tanks) - | 202,500 gallons     |
| c. | Tank Farm #7 (8 tanks) -   | 90,000 gallons      |
| d. | Tank Farm #8 (9 tanks) -   | 135,000 gallons     |
| e. | Tank Farm # 9 (6 tanks) -  | 90,000 gallons      |
| f. | Tank Farm # 14 (2 tanks) - | 6,000 gallons       |
| g. | Hydrapulper/Metal wash -   | 2,410 gallons       |
|    | 55 tanks                   | 750,910 gallons     |
|    | JJ tuille                  | , 50,5 t 0 Building |

A written assessment for all existing waste tank units has been performed and certified by an independent, qualified registered professional engineer in accordance with 40 CFR 264.191(a) and is on file at the facility in accordance with 35 IAC 724.292.

Secondary containment systems are designed, installed, and operated to prevent any migration of wastes or accumulated liquid out of the system to the soil, ground water, or surface water in accordance with 40 CFR 264.193(b)(1). All tanks are installed in accordance with UL 142 standards. All secondary containment systems are constructed of reinforced concrete.

A chemically impervious coating has been installed on the concrete surface of all permitted hazardous waste tank secondary containment areas to provide further protection and assurance of an impermeable barrier. The coating is compatible with the chemicals handled at the facility. The cone bottom tanks allow visual inspection of all sides of the tanks. The flat bottom tanks are set on rows of 1" X 2" stainless steel bars. This allows visual inspection beneath the flat bottom tanks and detection of any leaks from the tanks within 24 hours. Any leaks will drain from beneath the tanks into the secondary containment area where they will be discovered during the daily inspection or sooner.

All tanks are equipped with an ultrasonic or other type of level indicator. Each tank also has a separate high-level alarm system triggered by a capacitance probe installed in the top of the tank. Prior to transferring any material into a tank, the available volume is determined. The liquid level alarm setting is assigned at 90% of tank capacity. Upon the sounding of a high level alarm, the material handler manually shuts down any pump(s) feeding that tank.

#### **FACILITY HELD PERMITS**

Copies of the cover certificates for the facility's Part B, Air and Waste Water Treatment permits are included in **Attachment 2** of this information package. Permits maintained by the facility include:

| Type of<br>Permit                        | Permit Number  | Agency             | Approval date | Expiration<br>Date | Renewal<br>Submitted |
|--|----------------|--------------------|---------------|--------------------|----------------------|
| State Part B Permit –<br>Hazardous waste | 0310690006     | IEPA               | 11/03/93      | 11/03/03           | 5/1/03               |
| HSWA Part B Permit –<br>Hazardous waste  | ILD 980613913  | USEPA,<br>Region 5 | 11/03/93      | 11/03/03           | 5/1/03               |
| Title V - Air emissions                  | 031069AAJ      | IEPA               | 03/24/00      | 03/24/05           | N/A                  |
| POTW Discharge                           | 13429-3        | MWRD               | 02/04/00      | 02/03/05           | N/A                  |
| Waste Water<br>Treatment                 | 1997-EE-3751-1 | IEPA               | 02/25/98      | None               | N/A                  |

In addition, the over the road transportation Group operates under the name of Safety-Kleen Systems, Inc. with Transporter EPA ID # TXR 000050930. The Branch Operations responsible for local pick up operate under the name of Safety-Kleen Systems, Inc. with Transporter EPA ID # ILD 984908202.

The Illinois Environmental Protection Agency (IEPA), Bureau of Air has regulatory authority for implementation of the Clean Air Act requirements. Under the Clean Air Act, the Dolton facility is considered a major source for Volatile Organic Compounds (VOCs) and Hazardous Air Pollutants (HAPs). Therefore, the facility submitted a Title V application to IEPA on December 4, 1995. The permit itself was issued on March 24, 2000.

#### **MANAGEMENT OF HAZARDOUS WASTE**

#### Unacceptable waste Codes

Included as Attachment 3 is a list of hazardous waste codes that are <u>not accepted</u> at the Dolton Recycle Center. The Dolton facility has EPA approval to accept all other waste codes. However, due to operational and safety limitations, Dolton may not manage all the hazardous waste codes approved by permit.

#### Waste Analysis Plan

The Waste Analysis Plan outlines the steps taken to assure that the facility has sufficient information to verify the generator provided information on the waste's characteristics. The format and descriptions in the waste analysis plan may change as the Company's procedures and guidelines continue to be updated and improved.

#### Receipt Control

Receipt control and acceptance procedures are important components of waste management at the Dolton Recycle Center. Proper knowledge of the characteristics and quality control of the material received at the Dolton facility is of major importance to the safe and effective handling, storage, and processing of the accepted wastes. In addition, effective quality control helps assess the acceptability of the product and the cost

effectiveness of the operation. Receipt control consists of at least two steps: waste stream profiling and shipment receipt control analysis.

#### Waste Stream Profiling

The Waste Stream Profile Analysis is the analytical testing required by Safety-Kleen Systems, Inc. to make a technical judgment as to whether the proposed waste stream is consistent with the survey and meets operational and permit criteria. If adequate information has been provided through the survey, a sample may not be required.

Standard Operating Procedures (SOP's) have been developed for the qualification of a waste stream. The procedures outline the analytical approach to be applied to samples of waste streams being considered for acceptance as recoverable or recycle-as-fuels materials. The purpose of the Standard Operating Procedures is:

- To serve as a guide for those interacting with potential customers as to what information will be generated on each sample.
- To define the analyses to be performed on each type of sample received for evaluation
- To describe the criteria by which some testing may be waived or modified.

The procedures are to be used by Safety-Kleen Systems, Inc. laboratories when analyzing samples submitted for evaluation, prior to qualification of the waste stream for shipment from a client to a Safety-Kleen Systems, Inc. facility.

For waste stream profiling (characterization) analyses, the data provided by the generator is supplemented with analysis of the representative sample. The sample and Waste Material Profile Sheet are received, along with a preliminary disposition determination as to whether it is recoverable or should be used for fuels.

Based upon the phase characterization and the preliminary disposition determination, a set of analyses is assigned. All samples will undergo the following evaluations:

- Visually Determined Characteristics (e.g. color, obvious viscosity)
- PCB's
- Radioactivity
- Specific Gravity (except solids and high viscosity samples)
- pH (aqueous phase only in multiphase materials)
- Viscosity

Other tests, such as volatile organic analyses by gas chromatography, flammability, and recovery by distillation are done specific to the phase characterization and intended disposition.

#### **Shipment Receipt Control**

The second receipt control step occurs upon actual delivery to the Dolton facility. When a shipment arrives at the facility, the manifest(s) accompanying the shipment is (are) reviewed for completeness and for accuracy against the material actually arriving at the facility. Information that is checked includes:

- Generator Name, Address, EPA ID and Phone Number
- Transporter Name and EPA ID
- Facility Name, Address, EPA ID and Phone Number
- DOT Waste Description
- U.S.EPA Waste Code
- Ouantity
- Names, Signatures and Date of Generation and Transporter.

Simultaneously, the waste shipment is inspected for leaks and other packaging problems. If a problem is identified, the facility office is notified and appropriate measures are taken to correct, clean-up and (if necessary) return the waste to the generator, in compliance with applicable U.S. DOT, Illinois Environmental Protection Agency (IEPA) and U.S.EPA regulations.

Waste drums accepted at the facility must be properly labeled and marked. Containerized waste shipments are checked for proper labeling and marking, and the information on the hazardous waste label is checked against the manifest.

In accordance with regulations concerning manifesting, any discrepancy is first discussed with the generator. If it cannot be reconciled, but the material can otherwise be accepted, a manifest discrepancy report is filed with the (IEPA) and a copy sent to the generator. Alternately, the shipment must be rejected.

If it is determined that a shipment can be received, the manifest is signed and a copy of the manifest is given or sent to the transporter. Within 30 days of delivery, a copy of the completed manifest is returned to the generator.

If the waste material is found to be different from what was represented to be shipped, or it cannot be managed at the facility, a shipment can be rejected and returned to the generator, or sent to an alternate facility. This may occur even after "acceptance" of the shipment and release of the transporter. The information review process covers the following items:

- Permit limitations and conditions.
- Safety and health provisions.
- Process capability and availability.
- Compatibility of the material to the facility storage and operations.
- Storage volume availability.

- Generator Name and ID
- Transporter Name and ID
- Facility Name and ID
- DOT Waste Description.
- U.S. ÉPA Waste Code
- Quantity
- Primary Analytical Results.
- Secondary Analytical Results.

When a bulk load is accepted, it is assigned a storage tank and unloaded into that tank. The facility maintains records of the receiving tank for each shipment received. It also maintains current data on the contents of each tank.

When a containerized (drum) load of industrial waste is accepted, a drum tracking number (i.e., lot number) is placed onto each drum. This lot number is entered into a database, which tracks the movement of the drum through the facility.

#### **LABORATORY FACILITIES**

The Dolton Laboratory performs a schedule of testing that generates specific information on hazardous waste streams. Testing includes basic wet chemistry testing, fuels evaluation, and analysis of the volatile organic composition. This analytical information is then interpreted by qualified Safety-Kleen personnel, who make a determination of the disposition of the waste.

Upon receipt of a shipment, the load is sampled. If received in bulk, the sample is submitted directly to the laboratory for shipment receipt analysis. If received in drums, each drum is sampled. A composite of a maximum of twenty drums can be made up by using each line item on a manifest by the drum samplers. Samples are delivered to the on-site laboratory and laboratory personnel are authorized to composite samples of similar material from different generators for shipment receipt analysis. The sample is analyzed at a minimum for flash point, VOC, PCB content, material compatibility, and pH, to establish that the waste material received matches the manifest description. Additional tests may be performed to establish material quality and process settings for most efficient recovery.

The shipment receipt analysis is necessary to establish that the material received matches the profiled material. Since the waste material will be blended with other materials, tests to establish specification parameter levels, (e.g. BTU, ash, chloride, metals) are not part of the shipment receipt analysis, but may be conducted to assist in blending.

The Dolton Laboratory is designed to provide safeguards against chemical crosscontamination and is arranged to deliver maximum efficiency of analytical operations. The Laboratory is equipped with efficient ventilation systems. In addition, the laboratory is subject to inter company audits that evaluate operating procedures and quality control practices.

The Laboratory also houses a specifically designated areas for sample storage. Each receipt sample is required to be stored for a minimum of 60 days from the date of receipt. The sample is retained in the event that some type of analysis confirmation or further analytical data is needed.

#### **INSPECTION PLAN**

Dolton facility personnel conduct regular inspections of the facility for equipment malfunctions, structural or facility deterioration, operator error or other problems that could result in hazardous waste releases. These inspections occur daily. In addition, separate additional inspections are performed weekly, monthly and annually.

Completed inspection forms are assembled and reviewed at the facility office. Any deficiencies noted in the inspections are immediately corrected. In the event that the deficiency cannot be corrected immediately, a work order is written in order to ensure that appropriate resources are committed for corrective action.

Required non-emergency maintenance action detected during of an inspection will be brought to the attention of the maintenance department via a copy of the particular inspection report. The work will be scheduled for completion as soon as practical.

Imminent hazards detected during an inspection or any other time will result in immediate containment and remedial action

The various inspection reports are filed in the plant office in sections:

- Daily Inspection Forms
- Weekly Inspection Forms
- Monthly Inspection Forms

The reports are filed in chronological order and are maintained on file for an indefinite period.

#### **CONTINGENCY PLAN**

The Contingency Plan and other emergency procedures have been designed to minimize hazards to human health and the environment resulting from fires, explosions or any unplanned, sudden or non-sudden catastrophic release of hazardous waste or hazardous waste constituents to air, soil or surface water.

The emergency procedures are put into action immediately in the event of a fire, explosion or related release of materials in the facility. In addition, the Facility Manager

and his designees have the authority to put the emergency procedure into action in the event he believes such a condition is eminent, even though it is not occurring.

Emergency response agencies such as the local Fire and Police Departments, the Illinois Emergency management Agency, and the nearest hospital have been made aware of the Contingency Plan. These agencies have made a commitment to respond to an emergency at the facility. In addition to these agencies, private contractors offering emergency response, spill control and clean-up services have been contacted.

#### TRAINING PLAN

Safety-Kleen's Dolton Recycle facility stores, recycles and blends various organic solvent wastes. The everyday handling of such solvents require that employees be knowledgeable in the proper handling procedures to ensure public, environmental and personal safety.

The Dolton Recycle Facility is regulated by the State Department of Labor (OSHA) and also by the IEPA. Training programs were developed and implemented to comply with regulations set forth by the regulatory agencies which have governing authority of Dolton Recycle Center's daily operations.

The written Training Program is an outline of the various topics and requirements which are included in our ongoing training program.

#### New Hire Employees

Any new applicant accepted for employment at Safety-Kleen's Dolton Recycle Facility must first submit to and pass a pre-employment physical and drug screen. The physical includes, but is not limited to blood work, urinalysis, pulmonary function test, eye test, hearing test, drug screen, general health evaluation by a physician, and in some cases, EKG.

A new employee reporting to work will be required to fill out the new hire information pack. This is pertinent information which is used at Safety-Kleen Corporate Headquarters to comply with Federal employment regulations.

The new hire will undergo various types of training. Provided below is a table that summarizes the training required for full-time employees.

# TRAINING REQUIREMENTS NEW EMPLOYEES

| EMPLOYMENT STATUS                       | REQUIRED TRAINING   | WHEN                                       | TIME<br>ALLOTTED    |
|---|---|--|---------------------|
| New Full Time Safety-Kleen<br>Employee: | 24 Hour and<br>HMTS (DOT) Instructor Led<br>(includes CD-ROM) | First days of employment in facility.      | 3 Days and<br>1 Day |
|   | Site specific training on rules, policies and procedures.     | After completing 24 hour and DOT training. | 8 Hours             |

An employee that meets the definition of a HazMat employee under DOT must complete additional modules. These modules are included on the hazardous Materials Transportation Skills (HMTS) Interactive CD-ROM. This CD includes the following modules:

- Hazardous Materials Table
- Shipping Papers
- Packaging
- Marking and Labeling
- Placarding
- Carrier Requirements (Highway)

The employee must pass each title with a minimum score of 80% to be considered complete.

Upon completion of the aforementioned training, the new hire will be issued safety equipment relevant to the job function. The employee will be assigned to a work area with a senior, experienced employee(s). The shift supervisor will monitor the new hire's performance on a daily basis. The employee will not work alone in any aspect of the job until he demonstrates the ability to perform tasks in a confident manner. There is no set time limit for on the job training as each job is different and peoples' learning abilities vary.

The new hire employee will be given a ninety-day evaluation on his/her performance. This evaluation is the standard form which is used for all employee.

Promoted employees will undergo on the job training in their respective work area. The employee will work under the direct supervision of a senior employee in daily operations. The basic theories of operation, parameters and goals will be covered by the shift supervisor. The shift supervisor will initially work closely with the newly promoted employee. The newly promoted employee will be given more responsibilities and less supervision as demonstrated by his/her abilities to perform the required job functions.

The promoted employee will work under normal supervision once he/she demonstrates the ability to perform all job-related functions with confidence.

#### **Laboratory Personnel Training**

Laboratory specific training programs were developed by the Safety-Kleen Corporate Technical Center. The training program consists of an outline and specific procedures which are to be followed for testing methods approved by the Safety-Kleen technical staff. The lab personnel are periodically updated on knowledge of the analytical test methods and procedures. Laboratory personnel are also subject to most training requirements of the production personnel.

#### Maintenance Personnel Training

Maintenance personnel are hired and/or promoted on basis of knowledge and experience. The maintenance department consists of a Facility Engineer, Mechanics, Custodians, and a Clerk. The maintenance department is subject to most training requirements of the production personnel. In addition, maintenance personnel receive specific training on trade equipment and procedures by outside consultants.

#### **Process Specific Training**

Process specific training is conducted in compliance with the Safety-Kleen Systems, Inc. Process Safety Management policies.

#### Annual Refresher Training - OSHA Programs

Safety-Kleen's Dolton Recycle Center labor practices are regulated by the Illinois Department of Labor (OSHA). Safety-Kleen Systems, Inc. has developed and implemented training programs to comply with all applicable regulations. Training includes initial classroom, and where necessary, hands on training. Refresher training is conducted on an annual basis or as dictated by the regulation. All training is documented by either written tests, workbooks, or attendance records. Training documentation includes an outline to the topic covered, date, instructor, and length of training. The following is a list of some OSHA programs at the Dolton Recycle Facility

- Confined Space Entry
- Lockout/tagout
- Bloodborne Pathogens
- Forklift Operations
- Respiratory Protection
- Personal Protective Equipment
- Hot Work Permits
- Hazard Communication
- Fire Extinguishers

Process Safety Management

#### **Contingency Plan Training**

Contingency training, a condition of the facility's Part B Permit, is conducted on an annual basis at the Dolton Recycle Facility. All facility personnel are required to attend.

Public service employees are offered a plant tour annually to familiarize themselves with the facility layout, inventory, and characteristics of solvents handled at the Dolton Recycle Facility.

Dolton Recycle personnel are also trained in the following topics by either classroom, hands-on, or a combination of both. The topics are:

- Contingency Plan
- Self Container Breathing Apparatus (SCBA)
- Fire Suppression System
- Spill Prevention Control and Countermeasures Plan
- Container Management & Closure

Various other related topics are also included in the Emergency Preparedness "Safety Day" training events.

#### **RECORDKEEPING**

#### **Manifests**

State and Federal laws require Safety-Kleen facilities to keep manifests on site for three years. It is Safety-Kleen's policy to keep manifests throughout the life of the facility.

#### Land Disposal Restriction Notices

State and Federal laws require Safety-Kleen facilities to keep land disposal restriction notices on site for three years. It is Safety-Kleen's policy to keep these notices throughout the life of the facility.

#### Annual RCRA TSDF Report

Illinois Environmental Protection Agency (IEPA) regulations require that the facility file an annual hazardous and non-hazardous waste report. These reports detail the receipt and processing of all hazardous and non-hazardous wastes received at the facility, as well as the waste generated by the facility. The annual RCRA TSDF report is kept throughout the life of the facility.

#### Inspection Records

Inspection records are kept throughout the life of the facility.

#### **Training Records**

All employee training records are kept throughout the life of the facility.

#### CLOSURE PLAN AND COST ESTIMATE

The Closure Plan describes procedures to close the facility with respect to removal of inventory, decontamination of equipment and structures, and verification sampling and analysis to meet the closure objectives. The Closure Plan contains a discussion of the steps that would be necessary should Safety-Kleen Systems, Inc. decide to partially or completely close the Dolton Recycle Center during or at the end of its intended operation life. Procedures outlined for an unplanned partial closure are identical to the procedures that would be used for final planned closure.

The facility is not expected to close in the near future. However, for the purpose of the Closure Plan, the estimated permitted facility life is thirty-two years. The schedule for final closure of each hazardous waste management unit is identical and corresponds to the expected life of the facility. Therefore, closure is expected on each hazardous waste unit and the facility on December 31, 2035.

In addition to containing the procedures necessary to complete final closure of the facility, the Closure Plan also contains information necessary for partial closure of any hazardous waste management unit.

All closures will be complete and final upon removal of all waste and decontamination of all waste management units, associated equipment, containment systems and any other contaminated areas. Procedures described in the closure plan are also applicable to cleaning up of spills and repairing/decontaminating part of the facility or equipment.

Copies of the approved Closure Plan for the facility will be maintained at the facility offices and/or Safety-Kleen's Corporate Office until certification of closure completeness has been received from the U.S.EPA and/or the IEPA.

The current closure cost estimate for the facility is identified in Attachment 4.

#### FINANCIAL ASSURANCE

Safety-Kleen Systems, Inc. utilizes a Certificate of Insurance to financially assure closure of the facility and comply with the requirements of 40 CFR 263.143. Attachment 4 of this package has a copy of the most current Certificate of Insurance.

#### <u>INSURANCE</u>

Safety-Kleen maintains hazardous waste facility liability insurance for sudden and non-sudden accidental occurrences. This insurance policy is issued by Greenwich Insurance Company. The policy is renewed September 1 st of each year. The limits of sudden and non-sudden accidental occurrences liability are \$4,000,000 for each occurrence and \$8,000,000 annual aggregate. A copy of the insurance certificate is enclosed in this packet as **Attachment 5**.

#### REGULATORY COMPLIANCE

The facility is inspected by the IEPA to assure compliance with RCRA, air and water regulations. The facility typically is inspected one time per year for RCRA compliance and one time per year for compliance with air regulations. Results of the inspections are available for review during a facility audit. A regulatory contact list is included as **Attachment 6**.

#### GEOLOGY AND HYDROGEOLOGY

#### Soils and Geology

The area in the vicinity of the facility consists of low permeability lake silts and clays, with a few interbedded sand lenses. The sediments become more granular to the north. At least 30 feet of low permeability silts and clays are present. Under this low permeability silts and clays is the Silurian-age Niagaran Dolomite Series. The formation is underlain progressively by the Maquoqueta Shale and the Galena-Platteville Series.

#### **Hydrogeologic Conditions**

The regional hydrogeology includes two shallow, water-bearing zones: a near-surface water bearing zone perched on low permeability clays and silts and the Niagaran Dolomite aquifer. The shallow perched zone is generally 10-20 feet thick. Because the topography of the area is flat, the flow gradients in the perched zone are small. The Niagaran Dolomite aquifer is capable of producing significant yields of potable water principally from secondary solution features. Ground water generally flows toward the nearest surface water body. The regional flow direction in the dolomite is reported to be generally east or southeast.

#### Groundwater Quality/Quantity

Releases of solvent type materials are believed to have occurred at the site under previous ownership. As a result of groundwater monitoring conducted at the site by Safety-Kleen, the groundwater in the southeastern and northeastern areas of the site have been found to have the highest levels of contaminants. Monitoring wells MW-2 and MW-7 have detected constituents (benzene and toluene from MW-7, and vinyl chloride from MW-2)

that have exceeded the Tier I (Class II) Tiered Approach to Corrective Action Objectives (TACO) levels.

Groundwater monitoring data has been collected from the site since 1994. Groundwater samples were collected on a quarterly basis from 12 monitoring wells strategically placed throughout the facility. The last set of samples were collected in November 1998. Sampling has ceased pending the IEPA's response to Dolton's TACO evaluation submitted on January 14, 1999. Based upon these findings, IEPA has required that Safety-Kleen place a deed restriction regarding ground water use be placed upon the title to the property. The Environmental Land Use Control (ELUC) and supporting documentation was submitted to IEPA on April 4, 2003.

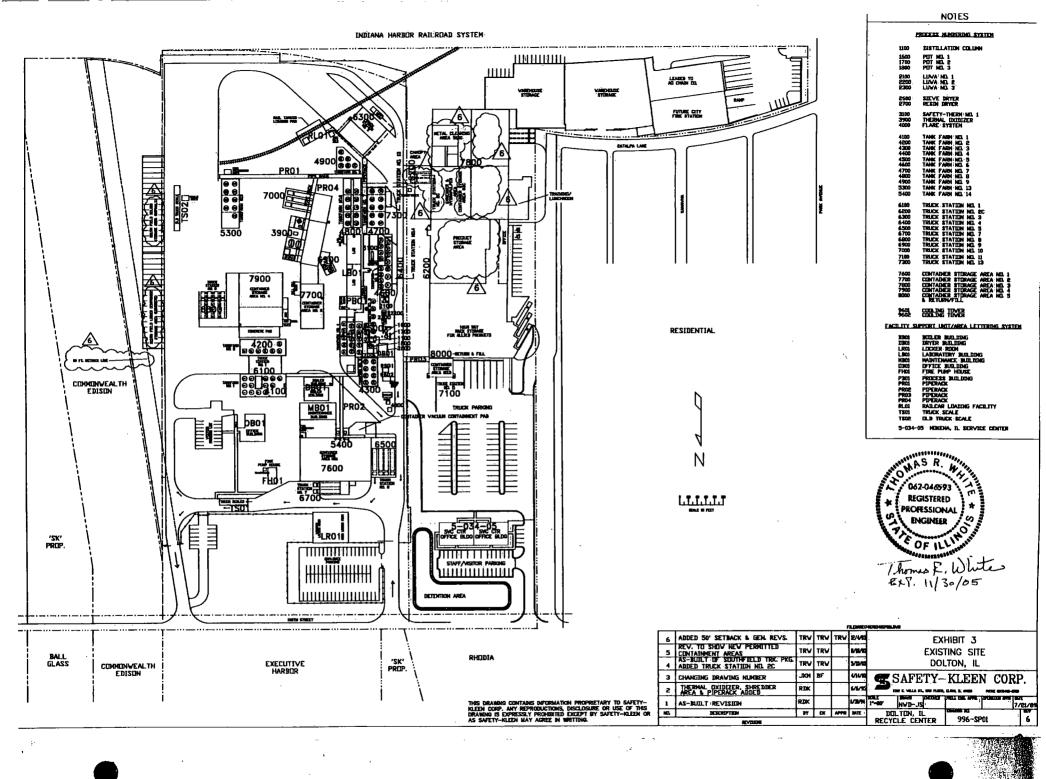
#### **Soil Quality**

Releases of solvent type materials are believed to have occurred at the site under previous ownership. As a result of soil sampling conducted at the site by Safety-Kleen, the soil has been identified as meeting Tier II TACO levels. IEPA approves the January 1999 report and accepts "no further action" for soil provided that an ELUC is executed.

My documents/dolrcra/dol audit pckt rev 5-03.doc

## **ATTACHMENT 1**

MAP OF THE DOLTON RECYCLE CENTER



## **ATTACHMENT 2**

PERMITS OBTAINED BY THE DOLTON RECYCLE CENTER



#### ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276. JAMES R. THOMPSON CENTER, 100 WEST RANDOLPH, SUITE 11-300, CHICAGO, IL 60601.

ROD R. BLAGOIEVICH, GOVERNOR

RENEE CIPRIANO, DIRECTOR

#### RCRA Log 120 Part B

#### ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

#### HAZARDOUS WASTE MANAGEMENT RCRA PART B PERMIT

IEPA #0310690006 -- Cook County USEPA ILD980613913 Safety-Kleen Environsystems, Inc. Permit Log #B-120-M-48 RCRA Part B

Effective Date: November 3, 1993 Expiration Date: November 3, 2003 Modification Date: January 12, 2004

Safety-Kleen Systems, Inc. 633 East 138th Street Dolton, Illinois 60419

A Part B permit is hereby granted pursuant to the Resource Conservation and Recovery Act, Illinois Environmental Protection Act, and Title 35 Illinois Administrative Code (I.A.C.) parts 702, 703, 705, and 720 through 729 to Safety-Kleen to maintain and operate a waste management facility involved in the treatment and storage of hazardous waste. Safety-Kleen Enviro System is located at 633 East 138th Street in Dolton, Illinois.

This permit consists of the conditions contained herein (including those in any attachments and appendices) and applicable regulations contained in the Illinois Environmental Protection Act and Title 35 I.A.C. Parts 702, 703, 705 and 720 through 729 in effect on the effective date of this permit. The Environmental Protection Act (Ill. Rev. Stat., Chapter 111 1/2, Section 1039) grants the Illinois Environmental Protection Agency the authority to impose conditions on permits which is issued. This Permit contains 178 pages including Attachments A through J.

If you have any questions regarding this permit, please contact Mark A. Schollenberger at 217/558-4717.

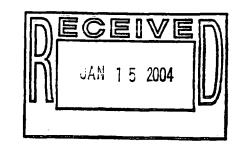
Sincerely

Joyce L. Munie, P.E. Manager, Permit Section

Bureau of Land

JLM:TL\mis\963372s.doc

cc: Harriet Croke - USEPA Region V



Section I: Container Storage

#### A. Hazardous Waste Management Units

Containers are managed in the following units:

| Container Storage Area #1                   | Status<br>Existing | Maximum Capacity* 187,000 gallons | 100 ft x 160 ft    |  |  |
|---|--------------------|-----------------------------------|--------------------|--|--|
| Container Storage Area #2                   | Existing           | 54,780 gallons                    | 40 ft x 103 ft     |  |  |
| Container Storage Area #3c                  | Existing           | 32,037 gallons                    | 120 ft x 89 ft     |  |  |
| Including:                                  | Postovio a         | 1 6                               |                    |  |  |
| Hopper for auger VC7801                     | Existing           | 1.5 cu yd**                       |                    |  |  |
| Hopper for SC-7811                          | Proposed           | 1.5 cu yd**                       |                    |  |  |
| Hopper for SC 7810                          | Proposed           | 1.5 cu yd**                       | 1 01 01            |  |  |
| T 7801/(refeed bin)                         | Existing           | 3 cu yds** top 6'x 6', height 5'  | bottom 2' x 3',    |  |  |
| Bin T-7803                                  | Proposed           | 600 gallons                       |                    |  |  |
| Bin T-7802                                  | Proposed           | 600 gallons                       |                    |  |  |
| Container Storage Area #5                   | Existing           | 22.000 gallons                    | 54 ft x 42 ft      |  |  |
| South Field Liquid Container                | Existing           | 196,136 gallons                   | 220 ft x 53 ft     |  |  |
| Storage Area (SFL)                          | · ·                | •                                 |                    |  |  |
| South Field Solid Container                 | Existing           | 720yd***                          | 220 ft x 52 ft     |  |  |
| Storage Area (SFS)                          | _                  |                                   |                    |  |  |
| Truck Station #2c                           | Existing           | 13,730 gallons                    | 46 ft x 22 ft      |  |  |
| Truck Station #4                            | Existing           | 26,235 gallons                    | 91 ft x 12 ft      |  |  |
| Truck Station #13                           | Existing           | 9,350 gallons                     | 34 ft x 12 ft      |  |  |
| Container Vacuum                            | Existing           | 15,125 gallons                    | 55 ft x 30 ft      |  |  |
| Containment Pad                             |                    |                                   |                    |  |  |
| Container Storage in                        | Proposed           | 21,615 gallons                    | 461/3ft. x 591/2ft |  |  |
| Building 5600                               |                    |                                   |                    |  |  |
| Including:                                  |                    |                                   |                    |  |  |
| Hopper for C-5604                           | Proposed Proposed  | 1.5 cu yd                         |                    |  |  |
| <ul> <li>Solids/metal exiting m</li> </ul>  | agnetic conve      | eyor                              |                    |  |  |
| Hopper for C-5605                           | Proposed           | 1.5 cu yd                         |                    |  |  |
| <ul> <li>Clean metal collected f</li> </ul> | rom magneti        | c belt                            |                    |  |  |
| Hopper for SC 7910                          | Proposed           | 1.5 cu yd                         |                    |  |  |
| Auger used to transfer waste                |                    |                                   |                    |  |  |
| Bin T-5601                                  | Proposed           | 600 gallons                       |                    |  |  |
| <ul> <li>Dirty metal feed</li> </ul>        | _                  |                                   |                    |  |  |

Containers of hazardous waste received at the facility for storage will arrive in either 5 gallon steel pails, 16 gallon drums (steel or polyethylene plastic), 30 gallon drums (steel or polyethylene plastic), 55 gallon steel drums, or 85 gallon overpacks. Containers in the storage area must be stored in a manner which is consistent with the NFPA requirements in Section 4.8 NFPA 30.

#### Section II: Tank Systems

#### A. Summary

The storage tanks at the Dolton Recycle Center are used for a variety of purposes, including product storage, storage of on site generated waste, hazardous waste storage, wastewater storage, fuel blending and treatment of hazardous waste. Of these uses, the storage of hazardous wastes and wastewaters, fuel blending and treatment of hazardous waste are the only uses that are regulated under a RCRA permit. On-site generated waste (i.e. still bottom and process waste water) may be stored in unpermitted tanks in accordance with 35 IAC 722. Associated with these activities are 56 existing above ground tanks. The facility has also proposed to develop 22 above ground tanks for storage in the future. All above ground tank areas have secondary containment consisting of a concrete vault and an impermeable membrane or coating which has been applied to the concrete.

#### B. Waste Identification

1. The Permittee may store a total volume of 1,326,310 gallons of waste in the tanks listed below subject to the terms of this permit.

| Tank<br><u>Numbe</u> | Tank<br>r <u>Farm</u> | Material of<br>Construction | Dimensions<br><u>Ht./length Dia.</u> | Capacity in Gallons |          | finimum Shell<br>hickness in Inches |
|----------------------|-----------------------|-----------------------------|--------------------------------------|---------------------|----------|-------------------------------------|
| 37                   | 4                     | CS                          | 32' 10'-6"                           | 15,000              | existing |                                     |
| 38                   | 4                     | CS                          | 32' 10'-6"                           | 15,000              | existing |                                     |
| 39                   | 4                     | CS                          | 32' 10'-6"                           | 15,000              | existing |                                     |
| 40                   | 4                     | CS                          | 32' 10'-6"                           | 15,000              | existing |                                     |
| 41                   | 4                     | CS                          | 32' 10'-6"                           | 15,000              | existing |                                     |
| 42                   | 4                     | CS                          | 32' 10'-6"                           | 15,000              | existing | .178                                |
| 43                   | 4                     | CS                          | 32' 10'-6"                           | 15,000              | existing | .178                                |
| 44                   | 4                     | CS                          | 32' 10'-6"                           | 15,000              | existing | .178                                |
| 45                   | 4                     | CS                          | 32' 10'-6"                           | 15,000              | existing | .178                                |
| 46                   | 4                     | CS                          | 32' 10'-6"                           | 15,000              | existing | .178                                |
| 47                   | 4                     | CS                          | 32' 10'-6"                           | 15,000              | existing | .178                                |
| 48                   | 4                     | CS                          | 32' 10'-6"                           | 15,000              | existing |                                     |
| 49                   | 4                     | CS                          | 32' 10'-6"                           | 15,000              | existing |                                     |
| 50                   | 4                     | CS                          | 32' 10'-6"                           | 15,000              | existing |                                     |
| 51                   | 4                     | CS                          | 32' 10'-6"                           | 15,000              | existing |                                     |

ILD980613913 Page II-2 of 14

| Tank<br>Number | Tank<br>Farm | Material of<br>Construction | Dimensions<br>Ht./length Dia.                            | Capacity in Gallons            |                                  | Minimum Shell<br>hickness in Inches |
|----------------|--------------|-----------------------------|--|--------------------------------|----------------------------------|-------------------------------------|
| 66<br>67<br>68 | 6<br>6<br>6  | CS<br>CS<br>CS              | 32' 10-6"<br>32' 10-6"<br>32' 10-6"                      | 15,000<br>15,000<br>15,000     | existing<br>existing<br>existing | .178<br>.178<br>.178                |
| 69<br>70       | 6<br>6       | CS<br>CS                    | 32' 10-6"<br>32' 10-6"                                   | 15,000<br>15,000               | existing existing                | .178<br>.178                        |
| 71<br>72       | 6<br>6       | CS<br>CS                    | 32' 10-6"<br>32' 10-6"                                   | 15,000<br>15,000               | existing existing                | .178<br>.178                        |
| 73<br>74       | 6<br>6       | SS<br>SS                    | 30'-9"10-6"<br>30'-9"10-6"'                              | 18,500<br>18,500               | proposed<br>proposed             |                                     |
| 75<br>76       | 6            | CS<br>CS                    | 15' 13'<br>32' 10'-6"                                    | 20.000<br>17.500               | existing existing                |                                     |
| 77<br>78<br>79 | 6<br>6<br>6  | CS<br>CS<br>CS              | 32' 10'-6"<br>32' 10'-6"<br>32' 10'-6"                   | 15.000<br>15.000<br>15.000     | existing<br>existing<br>existing |                                     |
| 80<br>T81      | 6<br>7       | CS<br>CS                    | 32' 10'-6"   | 15,000<br>15,000<br>-6" 15,000 | existing<br>existing             |                                     |
| T82<br>T83     | 7<br>7       | CS<br>CS                    | 32 10'-6"<br>32 10'-6"                                   | 15,000<br>15,000               | existing existing                |                                     |
| T84<br>T87     | 7<br>7       | CS<br>CS                    | 32 10'-6"<br>32 10'-6"                                   | 15,000<br>15,000               | existing existing                |                                     |
| T88            | 7<br>8       | CS<br>CS                    | 32'-10 1/2" 10'-<br>32'-10 1/2" 10'-                     | -6" 15,000                     | existing existing                |                                     |
| 94<br>95<br>96 | 8<br>8<br>8  | CS<br>CS<br>CS              | 32'-10 1/2" 10'-<br>32'-10 1/2" 10'-<br>32'-10 1/2" 10'- | -6"15.000                      | existing<br>existing             |                                     |
| 97<br>98       | 8<br>8       | CS<br>CS                    | 32'-10 1/2" 10'-<br>32'-10 1/2" 10'-<br>32'-10 1/2" 10'- | -6"15.000                      | existing<br>existing<br>existing |                                     |
| 99<br>100      | 8            | CS<br>CS                    | 32'-10 1/2" 10'-<br>32'-10 1/2" 10'-                     | -6"15,000                      | existing existing                |                                     |
| 101<br>102     | 8            | CS<br>CS                    | 32'-10 1/2" 10'-<br>32'-10 1/2" 10'-                     | -6"15,000                      | existing existing                |                                     |
| 103<br>104     | 8            | CS<br>CS                    | 32'-10 1/2" 10'-<br>32'-10 1/2" 10'-                     | -6"15,000                      | existing existing                |                                     |
| 131<br>132     | 9<br>9       | CS<br>CS                    | 32' 10'-6"<br>32' 10'-6"                                 | 15,000<br>15,000               | existing<br>existing             | ·                                   |

| Tank     | Tank        | Material of  | Dimension   |                | Capacity          | Ctata         | *Minimum Shell      |
|----------|-------------|--------------|-------------|----------------|-------------------|---------------|---------------------|
| Number   | <u>Farm</u> | Construction | Ht./length  | Dia.           | <u>in Gallons</u> | <u>Status</u> | Thickness in Inches |
| 133      | 9           | CS           |             | 0'-6"          | 15,000            | existing      |                     |
| 134      | 9           | CS           | 32' 1       | 0 <b>'-</b> 6" | 15.000            | existing      |                     |
| 135      | 9           | CS           | 32' 1       | 0' <b>-</b> 6" | 15,000            | existing      |                     |
| 136      | 9           | CS           | 32' 1       | 0'-6"          | 15.000            | existing      |                     |
| 168      | 10          | CS           | 40'-7 1/2"1 | 3'-6"          | 39,900            | proposed      | .1875               |
| 169      | 10          | CS           | 40'-7 1/2"1 | 3'-6"          | 39,900            | proposed      | .1875               |
| 170      | 10          | CS           | 40'-7 1/2"1 | 3'-6"          | 39,900            | proposed      | .1875               |
| 171      | 10          | CS           | 40'-7 1/2"1 | 3'-6"          | 39,900            | proposed      | .1875               |
| 172      | 10          | CS           | 40'-7 1/2"1 | 3'-6"          | 39,900            | proposed      | .1875               |
| 173      | 10          | CS           | 40'-7 1/2"1 | 3'-6"          | 39,900            | proposed      | .1875               |
| 210      | 11          | CS           | 32'-10 1/2" | 10'-6          | " 15,000          | proposed      | .178                |
| 211      | 11          | CS           | 32'-10 1/2" | 10'-6          | " 15,000          | proposed      |                     |
| 212      | 11          | CS           | 32'-10 1/2" | 10'-6          | " 15,000          | proposed      |                     |
| 213      | 11          | CS           | 32'-10 1/2" | 10'-6          | " 15,000          | proposed      |                     |
| 214      | 11          | CS           | 32'-10 1/2" | 10'-6          | " 15,000          | proposed      |                     |
| 215      | 11          | CS           | 32'-10 1/2" | 10'-6          | " 15,000          | proposed      |                     |
| 216      | 11          | CS           | 32'-10 1/2" | 10'-6          | " 15,000          | proposed      |                     |
| 217      | 11          | CS           | 32'-10 1/2" | 10'-6          | " 15,000          | proposed      |                     |
| 218      | 11          | CS           | 32'-10 1/2" | 10'-6          | " 15,000          | proposed      |                     |
| 219      | 11          | CS           | 32'-10 1/2" | 10'-6          | " 15,000          | proposed      |                     |
| 220      | 11          | CS           | 32'-10 1/2" | 10'-6          | " 15,000          | proposed      |                     |
| 221      | 11          | CS           | 32'-10 1/2" | 10'-6          | " 15,000          | proposed      |                     |
| 226      | 12          | CS           | 32'-10 1/2" | 10'-6          | •                 | proposed      |                     |
| 227      | 12          | CS           | 32'-10 1/2" | 10'-6          | ,                 | proposed      |                     |
| 231      | 12          | CS           | 32'-10 1/2" | 10'-6          |                   | proposed      |                     |
| 232      | 12          | CS           | 32'-10 1/2" | 10'-6          |                   | proposed      |                     |
| Vl       | 14          | CS           | 11'-2"      | 8'             | 3,000             | existing      |                     |
| V2       | 14          | CS           | 11'-2"      | 8"             | 3,000             | existing      |                     |
| Hydrapul | lper Area   | 3c CS        |             |                | 660               | existing      | .125 (shell) .37    |
|          |             |              |             |                |                   |               | (cone)              |

<sup>\*</sup>Minimum shell thickness as certified by a independent Illinois registered P.E. in accordance with Condition 4 below.

#### Section III: Miscellaneous Units

#### A. Summary

The Permittee shall be allowed to operate the treatment units identified below for the treatment of hazardous and/or mixed waste, subject to the conditions as specified in this section.

| Miscellaneous Unit                  | Permitted Capacity | Unit Description   |
|-------------------------------------|--------------------|--|
| 1. Pot Still #3 Distillation Column | 1200 gallons/hour  | Consists of Pot Still #3 Distillation Column and an air pollution control system (chilled vent condensers and thermal oxidizer or flare as a secondary control device) |
| 2. LUWA Thin-Film Evaporator #1     | 660 gallons/hr     | Consists of the LUWA Thin Film Evaporator and an air pollution control system (chilled vent condensers and thermal oxidizer or flare as a secondary control device)    |
| 3. LUWA Thin-Film Evaporator #2     | 1320 gallons/hr.   | Consists of the LUWA Thin Film Evaporator and an air pollution control system (chilled vent condensers)  |
| 4. LUWA Thin-Film Evaporator #3     | 1320 gallons/hr    | Consists of the LUWA Thin Film Evaporator and an air pollution control system (chilled vent condensers)  |
| 5. Shredder                         | 3 drums/2 min.     | Two shredding sections housed in a vertical tower that is operated under a nitrogen blanket  |
| 6. Rolling Ring Mill                | 14,530 lbs/hr      | Consists of feed hopper. conveyor, rolling mill. vibrating conveyor, magnetic belt conveyor, and collection hoppers (3).   |

#### ILLINOIS ENVIRONMENTAL PROTECTION AGENCY



P.O. Box 19506, Springfield, Illinois 62794-9506

RENEE CIPRIANO, DIRECTOR

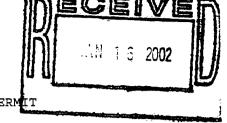
217/782-2113

"REVISED"

TITLE V - CLEAN AIR ACT PERMIT PROGRAM (CAAPP) PERMIT

and

TITLE I PERMIT¹



#### PERMITTEE

Safety-Kleen Systems, Inc. - Dolton Recycle Center Attn: Robert Burke, III, Environmental Compliance Manager 633 East 138th Street Dolton, Illinois 60419-1058

<u>Application No.</u>: 95120114 <u>I.D. No.</u>: 031069AAJ

Applicant's Designation: Date Received: December 7, 1995

Operation of: Solvent Recycling Center/Recovered Solvents

Date Issued: March 24, 2000 Expiration Date<sup>2</sup>: March 24, 2005

Source Location: 633 East 138th Street, Dolton

Responsible Official: Joseph T. Biggio, Facility Manager

This permit is hereby granted to the above-designated Permittee to OPERATE a solvent recycling center, pursuant to the above referenced permit application. This permit is subject to the conditions contained herein.

Revision Date Received: January 2, 2001 Revision Date Issued: January 11, 2002 Purpose of Revision: Minor Modification

This minor modification changes emission limits for two boilers in Condition 7.5.6 to make them consistent with current emission factors, adds a provision for a contingent ERMS allotment in Condition 6.8, and removes the Safety Therm (ST-1) evaporator and associated condenser.

This document only contains those portions of the entire CAAPP permit that have been revised as a result of this permitting action. If a conflict exists between this document and previous versions of the CAAPP permit, this document supersedes those terms and conditions of the permit for which the conflict exists. The previous permit issued March 24, 2000 is incorporated herein by reference.

Please attach a copy of this amendment and the following revised pages to the front of the most recently issued entire permit.

GEORGE H. RYAN, GOVERNOR

If you have any questions concerning this permit, please contact Jonathan Sperry at 217/782-2113.

Donald E. Sutton, P.E. Manager, Permit Section

Division of Air Pollution Control

DES:JS:jar

cc: Illinois EPA, FOS, Region 1

USEPA

This permit may contain terms and conditions which address the applicability, and compliance if determined applicable, of Title I of the CAA and regulations promulgated thereunder, including 40 CFR 52.21 - federal PSD and 35 IAC Part 203 - Major Stationary Sources Construction and Modification. Any such terms and conditions are identified within this permit.

Except as provided in Condition 8.7 of this permit.



### Metropolitan Water Reclamation District of Greater Chicago

100 EAST ERIE STREET

CHICAGO, ILLINOIS 60611-2803

312 / 751-5600

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#### INDUSTRIAL USER DISCHARGE AUTHORIZATION

User Number: 13429 Discharge Authorization No. 13429-3

In accordance with the provisions of Appendix D of the Sewage and Waste Control Ordinance (Ordinance) of the Metropolitan Water Reclamation District of Greater Chicago (District),

Safety-Kleen Systems, Inc.
Dolton Recycle Center
633 E. 138th Street
Dolton, Illinois

is hereby authorized to discharge process wastewater from—the above identified facility and through the outfalls identified herein into the sewerage system of the District, in accordance with the conditions set forth in this authorization and the Ordinance. Compliance with this authorization does not relieve the discharger of its obligation to comply with any standards or requirements under local, state and federal laws, including any such regulations, standards, requirements or laws that may become effective during the term of this authorization.

Noncompliance with any term or condition of this authorization shall constitute a violation of the Ordinance and may constitute grounds for revocation of this authorization.

This authorization shall become effective on February 4, 2000 and shall expire at 11:59 p.m. on February 3, 2005.

If the discharger wishes to continue to discharge after the expiration date of this authorization, an application must be filed for a renewal authorization in accordance with the requirements of Appendix D of the Ordinance, a minimum of 90 days prior to the expiration date.

Witnessed: February 4, 2000 Metropolitan Water Reclamation District of Greater Chicago

John C. Farnan

Acting General Superintendent

Richard C. Sustich Assistant Director

Research and Development Industrial Waste Division

EN182 4/16/93

#### ILLINOIS ENVIRONMENTAL PROTECTION AGENCY WATER POLLUTION CONTROL PERMIT

OG NUMBERS:

5720-97

PERMIT NO .:

1997-EE-3751-1

FINAL PLANS, SPECIFICATIONS, APPLICATION

AND SUPPORTING DOCUMENTS

PREPARED BY:

DATE ISSUED: February 25, 1998

SUBJECT:

SAFETY-KLEEN CORPORATION-Dolton-Pretreatment of Aqueous Brake Cleaner/Aqueous Parts

Washer, Bottom Sediments and Water from Mineral Spirits Parts Washer and Industrial Waste Water-

Tributary to the Metropolitan Water Reclamation District of Greater Chicago (Calumet WRP)

PERMITTEE TO CONSTRUCT

Safety-Kleen Corporation One Brinckman Way Elgin, Illinois 60123

Supplemental permit is hereby granted to the above designated permittee(s) to construct water pollution control facilities, which were previously approved under Permit No. 1997-EE-3751, dated September 10, 1997. These facilities have not been revised and remain as follows:

A sediment and solids removal unit consisting of 3 existing 15,000 gallon cone bottom settling tanks, 2 new 4,400 gallon cone bottom settling tanks, a new 20 micron bag filter and a new 1 micron bag filter each rated at 50 gpm, an emulsion breaking unit consisting of 2 existing 18,500 gallon emulsion breaking tanks, 2 existing 18,500 gallon oil/solids storage tanks, a new 20 micron bag filter and a new 1 micron bag filter each rated at 50 gpm, a VOC removal unit consisting of 3 existing thin film evaporators each rated at 25 gpm, an existing distillation column, a new steam stripper, 9 existing 15,000 gallon feed tanks and 5 existing 15,000 gallon storage tanks, a membrane filtration unit consisting of 2 new 4,400 gallon feed tanks, a new 1 micron bag filter rated at 50 gpm, a new membrane filtration unit, a new membrane flush unit, a new 4.400 gallon retenate tank. a new 4,400 gallon permeate holding tank, a new 850 gallon oil holding tank and all necessary piping, pumps and appurtenances to treat 750,000 gallons per year of aqueous brake cleaner, 200,000 gallons per year of bottom sediments and water and 1,700,000 gallons per year of Industrial waste water all to be treated at an average rate of 7,200 gpd and a maximum rate of 36,000 gpd tributary to the Metropolitan Water Reclamation District of Greater Chicago (Calumet WRP).

#### Page 1 of 3

THE STANDARD CONDITIONS OF ISSUANCE INDICATED ON THE REVERSE SIDE MUST BE COMPLIED WITH IN FULL. READ ALL CONDITIONS CAREFULLY.

TGM:REP:98021001:grm

**EPA - Maywood FOS** Records - Industrial

Binds

Village of Dolton

Metropolitan Water ReclamationDistrict

of Greater Chicago

DIVISION OF WATER POLLUTION CONTROL

Thomas G. McSwiggin, P.E.

Manager, Permit Section

# ILLINOIS ENVIRONMENTAL PROTECTION AGENCY WATER POLLUTION CONTROL PERMIT

LOG NUMBERS:

5720-97

**PERMIT NO.:** 

1997-EE-3751-1

FINAL PLANS, SPECIFICATIONS, APPLICATION AND SUPPORTING DOCUMENTS

DATE ISSUED:

February 25, 1998

PREPARED BY:

SUBJECT:

SAFETY-KLEEN CORPORATION--Dolton--Pretreatment of Aqueous Brake Cleaner/Aqueous Parts

Washer, Bottom Sediments and Water from Mineral Spirits Parts Washer and Industrial Waste Water-

Tributary to the Metropolitan Water Reclamation District of Greater Chicago (Calumet WRP)

This Permit is issued subject to the following Special Condition(s). If such Special Condition(s) require(s) additional or revised facilities, satisfactory engineering plan documents must be submitted to this Agency for review and approval for issuance of a Supplemental Permit.

SPECIAL CONDITION 1: The operational portion of this permit shall be governed by the Metropolitan Water Reclamation District of Greater Chicago.

SPECIAL CONDITION 2: The issuance of this permit does not relieve the permittee of the responsibility of complying with 35 Ill. Adm. Code, Part 307 and/or the General Pretreatment Regulations (40 CFR 403) and any guidelines developed pursuant to Section 301, 306, or 307 of the Federal Clean Water Act of 1977.

SPECIAL CONDITION 3: The issuance of this permit does not relieve the permittee of the responsibility of complying with any limitations and provisions imposed by the .Village of Dolton and/or the Metropolitan Water Reclamation District of Greater Chicago.

SPECIAL CONDITION 4: The operation of the pretreatment facilities must be under the direct and active field supervision of a certified industrial treatment plant operator in accordance with the State of Illinois Rules and Regulations, Title 35, Subtitle C, Chapter 1, Part 312.

#### SPECIAL CONDITION 5:

- a. Accumulation of hazardous waste at this facility (if generated) shall be carried out in accordance with 35 III. Adm. Code, Chapter 1, Subtitle G, Part 722: Standards Applicable to Generators of Hazardous Waste.
- b. Transport of all special waste to a permitted treatment, storage or disposal site shall be carried out in accordance with Title
   35 Ill. Adm. Code, Chapter 1, Subtitle G, Part 809: Special Waste Hauling.

#### SPECIAL CONDITION 6:

- a. Liquids, solids, or gases which by reason of their nature or quantity may cause fire or explosion; or be injurious in any other way to sewers, treatment works, or cause a safety hazard to the personnel operating the treatment works, or cause the effluent from the treatment works to violate applicable effluent standards are prohibited;
- b. Solid or viscous wastes which cause obstruction to the flow in sewers or other interference with the proper operation of any sewer or treatment works are prohibited.

SPECIAL CONDITION 7: The permittee shall determine the concentration of individual organic pollutants and make a reasonable attempt to determine the concentration of mixtures of organic pollutants that could be discharged that may cause a fire or explosion hazard by utilizing "Guidance to Protect POTW Workers from Toxic and Reactive Gases and Vapors" EPA 812-B-92-001. These determinations shall be utilized as guidance to ascertain whether additional treatment should be expected.

## WATER POLLUTION CONTROL PERMIT

LOG NUMBERS: 5720-97 PERMIT NO.: 1997-EE-3751-1

AL PLANS, SPECIFICATIONS, APPLICATION

AND SUPPORTING DOCUMENTS

DATE ISSUED: February 25, 1998

PREPARED BY:

SUBJECT: SAFETY-KLEEN CORPORATION-Dolton-Pretreatment of Aqueous Brake Cleaner/Aqueous Parts

Washer, Bottom Sediments and Water from Mineral Spirits Parts Washer and Industrial Waste Water-

Tributary to the Metropolitan Water Reclamation District of Greater Chicago (Calumet WRP)

SPECIAL CONDITION 8: The bottom sediments and water waste stream shall have a closed cup flash point test performed prior to treatment. Should the flash point be less than 140°F using the test method specified in 40 CFR 261.21 then the waste stream shall be treated by the VOC removal unit prior to membrane filtration and discharge.

## **ATTACHMENT 3**

## EPA Waste Codes NOT ACCEPTABLE

| D003 | F020 | K027 | P006 | U006 |
|------|------|------|------|------|
|      | F021 | K044 | P009 | U020 |
|      | F022 | K045 | P042 | U023 |
|      | F023 | K047 | P065 | U033 |
|      | F026 | K161 | P081 | U096 |
| •    | F027 |      | P112 | U133 |
|      | F028 |      | P122 | U160 |
|      |      |      |      | U189 |
|      |      |      |      | U205 |
|      |      |      |      | U223 |
|      |      |      |      | U234 |

## **ATTACHMENT 4**

CERTIFICATE OF INSURANCE FOR CLOSURE
MAINTAINED BY THE
DOLTON RECYCLE CENTER



March 9, 2004

Mr. Blake Harris
Financial Assurance Section
Illinois Environmental Protection Agency
1021 North Grand Avenue East
Springfield, IL 62794-9276

RE:

Updated Financial Assurance

Chicago Elgin Caseyville ILD005450697 ILD000805911

ILD981097819 ILD980613913 ILD093862811

Dolton Pekin Urbana

ILD981088388

Dear Mr. Harris:

Please find enclosed an original Certificate of Insurance under Policy Number PEC000659402, issued by Indian Harbor Insurance Company, for the above referenced Safety-Kleen facilities. This certificate has been amended, effective January 25, 2004, to reflect the annual inflation increase of the closure and/or post-closure care cost by using the final 2002 annual implicit price deflator of 1.012 as published by the U.S. Department of the Commerce in March 2003. All other terms and conditions of the policy remain unchanged.

If you have any questions, please contact me at 803-359-7569 or at khodge@safety-kleen.com.

Sincerely,

Kathy Hodge

Environmental Compliance Manager

cc:

Bob Burke

Matthew Sauvageau

Kevin Farmer

#### CERTIFICATE OF INSURANCE FOR CLOSURE AND/OR POST-CLOSURE CARE

| Name and Address of Insurer Indian Harbor In (herein called the "Insurer"):  | surance Company                    |                                 |                         | ·····                |
|--|------------------------------------|---------------------------------|-------------------------|----------------------|
| Seaview House, 70 Seaview Avenue   | Stamford, CT 06902 <sup>1</sup>    | 6040                            |                         |                      |
| Name and Address of Insured (herein called the "Insured"): Safety-Kleen Sy   | stems, Inc.                        |                                 |                         |                      |
| 5400 Legacy Drive, Cluster II, Bu  | ilding 3, Plano, TX <sup>(2)</sup> | 75024                           |                         |                      |
| Facilities Covered:  |                                    |                                 |                         |                      |
|  |                                    |                                 |                         | Closure              |
| USEPA I.D. No. IL005450697   |                                    | Closure<br>Amount               | Post-ClosureAmount      | Post-Clo             |
| (3)  |                                    | (4)                             | (5)                     | (6)                  |
| Name Safety-Kleen Systems, Inc.  | \$3,62                             | 7,062                           | \$576,307               | \$4,203,369          |
| Address 1445 W. 42nd Street  |                                    |                                 | <del></del>             | <del></del>          |
| City Chicago, IL 60609   | <u> </u>                           | _                               | *                       |                      |
| USEPA I.D. No. ILD000805911  |                                    |                                 | * *                     |                      |
|  |                                    |                                 |                         | •                    |
| Name Safety-Kleen Systems, Inc.  | \$1,330,                           | 527                             | <b>\$27,</b> 578        | \$1,358,105          |
| Address 1506 E. Villa Street   |                                    |                                 | <u> </u>                | e egit e             |
| City Elgin, IL 60120   |                                    |                                 |                         |                      |
|  |                                    | -                               |                         | erene<br>Versel      |
| Please attach a separate page if more space is needed for  | all facilities.                    |                                 |                         | and the              |
| \$13,752,794 Face Amount:  |                                    |                                 |                         |                      |
| Policy Number: PEC000659402  |                                    |                                 | •                       |                      |
| January 205, 2004  |                                    |                                 |                         |                      |
| Effective Date: (9)  |                                    |                                 | -                       | **                   |
| The Insurer hereby certifies that it has issued to the Insurer, post-closure, corrective f                           | ired the policy of insurance ide   | ntified above                   | to provide financial as | surance for          |
| closure, post-closure, corrective f  | r the facilities identified above. | The Insurer i                   | further warrants that s | uch policy conform   |
| respects with the requirements of 35 Illinois Administra-  | •                                  |                                 |                         |                      |
| 725.243 and 725.245 respectfully, as applicable and as sucvision of the policy inconsistent with such regulations is |                                    |                                 | =                       | it is agreed that a  |
| Whenever requested by the Director of the Illinois Envir   | nmental Protection Agency, her     | reafter called                  | IEPA the Insurer agre   | es to furnish to the |
| Director a duplicate original of the policy listed above, i  | cluding all endorsements there     | on.                             |                         |                      |
| Name — (Authorized signature for lusurer)  | 1/                                 |                                 |                         |                      |
| Typed Name Richard Ringenwald  |                                    |                                 |                         |                      |
| Title Vice President   | Tricia L. Edwa                     | arial Seal<br>ards, Notary P    | ublic                   |                      |
| Signature of witness or notary:  | Uwchlan Twp<br>My Commission E     | ., Chester Co<br>Expires June 2 | unty<br>21, 2004        |                      |
| Date 3/6/04  | Member, Pennsylvan                 | nia Association o               | of Motaries             |                      |
|  | ***                                |                                 |                         |                      |

The Agency is authorized to require that the Insured submit this document under Illinois Compiled Statutes, 1994, Chapter 415, Act 5, Section 21(f)(as amended). Fai to do so may result in a civil penalty against the Insured of not to exceed \$25,000 per day of violation. Falsification of this information by any person may constitute a CI 4 felony, and may also carry a fine of not to exceed \$25,000 per day for the first offense. This form has been approved by the Forms Management Center.

IL 532 1203

LPC 151 Rev. Dec-96

|   | Closure<br><u>Amounts</u><br>4 | Post-Closure Amount 5 | Corrective<br><u>Action</u> | Closure & Post-Closure Amounts |
|---|--------------------------------|-----------------------|-----------------------------|--------------------------------|
| USEPA I.D. No. ILD981097819 3 Name: Safety-Kleen Systems, Inc. Address: 20 Tucker Drive City: Caseyville, IL 62232        | 375,624                        | 0                     | 0                           | 375,624                        |
| USEPA I.D. No. ILD980613913 3 Name: Safety-Kleen Systems, Inc. Address: 633 E. 138th Street City: Dolton, IL 60419        | 7,337,427                      | 0                     | 114,406                     | 7,451,833                      |
| USEPA I.D. No. ILD000665869  3  Name: Safety-Kleen Systems, Inc. Address: 450 Domenic Court City: Franklin Park, IL 60131 | 0                              | 0                     | 0                           | 0                              |
| USEPA I.D. No. ILD093862811  3  Name: Safety-Kleen Systems, Inc. Address: RR 3/14249 VFW Road City: Pekin, IL 61554       | 185,658                        | 0                     | 0                           | 185,658                        |
| USEPA I.D. No. ILD079749073  3  Name: Safety-Kleen Systems, Inc. Address: 728 Morse Avenue City: Schaumberg, IL 60193     | 0                              | . 0                   | 0                           | 0                              |
| USEPA I.D. No. ILD981088388  3  Name: Safety-Kleen Systems, Inc. Address: 500 W. Anthony Drive City: Urbana, IL 61801     | 151,182                        | 27,023                | . 0                         | 178,205                        |

## **ATTACHMENT 5**

LIABILITY INSURANCE MAINTAINED BY THE DOLTON RECYCLE CENTER



## safety-kleen ®

September 15, 2003

Mr. Blake Harris
Illinois Environmental Protection Agency
Planning and Reporting Section
Bureau of Land
1021 North Grand Avenue East
Springfield, Illinois 62794-9276

RE: Liability Insurance

Safety-Kleen Systems, Inc.

Dear Mr. Harris:

Please find enclosed an original Hazardous Waste Facility Certificate of Liability for the Safety-Kleen Systems, Inc. facilities located in Illinois. This certificate, effective September 1, 2003 is issued by Greenwich Insurance Company under policy number PEC000709902.

If you have any questions regarding the certificate, I may be reached at 803-359-7569 or at kathy.hodge@safety-kleen.com.

Sincerely,

Kathy Hodge

fulth tox

Environmental Compliance Manager

cc: Matt Sauvageau

Kevin Farmer Bob Burke

#### HAZARDOUS WASTE FACILITY CERTIFICATE OF LIABILITY INSURANCE

| 1.          | Stamfo<br>injury a<br>Plano, | rd, CT 069<br>ind proper<br>TX 76024 | 902-6040, here<br>by damage to signification        | eby certif<br>Safety-Kl<br>with the | view House, 70 Seaview<br>fies that it has issued liab<br>leen, Corp. of 5400 Lega<br>Insured's obligation to de<br>arts 724.247 or 725.247.   | oility insura<br>cy Drive,<br>emonstrat | ance covering b<br>Cluster II, Bldg :<br>e financial respo | 3,<br>onsibility |
|-------------|------------------------------|--------------------------------------|---|-------------------------------------|--|---|--|------------------|
|             |                              | Sudden A<br>Occurren                 | Accidental<br>ces                                   |                                     | Nonsudden Accidental<br>Occurrences  | 2                                       | X Sudden & Nor<br>Accidental<br>Occurrences                | ısudder          |
|             | USEPA                        | I.D. No.                             | ILD00080592   | 29                                  |  |   |  |                  |
|             | Name:                        |                                      | Safety-Kleen  | , Согр.                             |  |   |  |                  |
|             | Addres                       | s:                                   | 306 Campus  | Drive                               |  |   |  |                  |
|             | City:                        |                                      | Arlington He  | ights, IL (                         | 60004  |   |  |                  |
|             | (SEE A                       | TTACHE                               | LIST OF LO  | CATION                              | S) (ILLINOIS)  |   |  |                  |
|             | exclusi                      | ve of legal                          | defense costs                                       | s. The c                            | h occurrence and \$8,000<br>overage is provided unde<br>ctive date of said policy i  | er policy n                             | umber PEC000   | 709902           |
| 2.          | The Ins                      | surer furthe                         | er certifies the                                    | following                           | g with respect to the insu   | rance des                               | scribed in Parag   | raph 1:          |
|             | (a)                          | Bankrupt<br>under the                | •   | cy of the                           | insured shall not relieve  | the Insur                               | er of its obligation                                       | ns               |
| <b>2.</b> - | (b)                          | policy, wi                           | th a right of re<br>This provision<br>verage is dem | imburse<br>does no                  | ment of amounts within a<br>ment by the insured for a<br>t apply with respect to th<br>d as specified in 35 Illino   | iny such p<br>at amoun                  | payment made but tof any deductil                          | y the<br>ole for |
|             | (c)                          | (IEPA), th                           |   | ees to fu                           | ector of the Illinois Environing the control of the Director a significant control of the Contro |   |  |                  |

- (d) Cancellation of the insurance, whether by the Insurer, the insured, a parent corporation providing insurance coverage for its subsidiary, or by a firm having an insurable interest in and obtaining liability insurance on behalf of the owner or operator of the hazardous waste management facility, will be effective only upon written notice and only after the expiration of sixty (60) days after a copy of such written notice is received by the Director.
- (e) Any other termination of the insurance will be effective only upon written notice and only after the expiration of thirty (30) days after a copy of such written notice is received by the IEPA Director.

I hereby certify that the Insurer is licensed to transact the business of insurance, or eligible to provide insurance as an excess or surplus lines insurer, in one or more States.

May the Swandye

(Signature of Authorized Representative of Insurer)

Mary Ann Susavidge, Assistant Vice President Authorized Representative of Greenwich Insurance Company

c/o XL Environmental, Inc. 520 Eagleview Boulevard P.O. Box 636 Exton, PA 19341-0636

The Agency is authorized to require that the insured submit this document under Illinois Compiled Statutes, 1994, Chapter 415, Act 5, Section 21(f) (as amended). Failure to do so may result in a civil penalty against the insured of not to exceed \$25,000 per day of violation. Falsification of this information by any person may constitute a Class 4 felony, and may also carry a fine of not to exceed \$25,000 per days for the first offense. This form has been approved by the Forms Management Center.

#### SAFETY-KLEEN LOCATIONS

#### STATE OF ILLINOIS

Safety-Kleen Corp. 306 Campus Drive

Arlington Heights, IL 60004

ILD000805929

Safety Kleen Corp. 20 Tucker Drive

Caseyville, IL 62232

Safety Kleen Corp. 1445 W. 42<sup>nd</sup> Street

Chicago, IL

ILD981097819

ILD005450697

Safety Kleen Corp. 12555 W. Old Higgins Road Elk Grove Village, IL 60007

Safety Kleen Corp. 633 E. 138<sup>th</sup> Street **Dolton, IL 60419** 

ILD980613913

Safety Kleen Corp. 13925 Center Avenue **Dolton, IL 60419** 

ILD980613913

Safety Kleen Corp. 1506 E. Villa Street Elgin, IL 60120

> Safety Kleen Corp. One Brinckman Way Elgin, IL 60123

Safety Kleen Corp. 920 Davis Road 4<sup>th</sup> & 5<sup>th</sup> Floors Elgin, II 60127

Safety Kleen Corp. 1500 E. Villa Street Elgin, IL 60120

ILD000805911

ILD000805911

Safety Kleen Corp. ILD000805911 1502 E. Villa Street Elgin, IL 60120 ILD000665869 Safety Kleen Corp. **412 Dominic Court** Franklin, IL 60131 Safety Kleen Corp. ILD000665851 9631 W. 194<sup>th</sup> Place Mokena, IL 60448 Safety Kleen Corp. ILD093862811 **Rural Route 3** Pekin, IL 61554 Safety Kleen Corp. ILD079749073 728 Morse Avenue Schaumburg, IL 60193 Safety Kleen Corp. ILD981088388 500 W. Anthony Drive Urbana, IL 61801

#### **ATTACHMENT 6**

#### Regulatory Agencies for the Safety-Kleen Dolton Recycle Center

#### **RCRA** Permitting

Illinois Environmental Protection Agency 1021 North Grand Avenue East Springfield, IL 62794 (217) 524-3307 Contact: Mark Schollenberger

U.S. EPA Region 5 77 West Jackson Boulevard Chicago, IL 60604 (312) 886-2967 Contact: Jim Blough

#### **RCRA** Inspection

Illinois Environmental Protection Agency 9511 Harrison Street Des Plaines, IL 60016 (847) 294-4080 Contact: Calvin Harris

#### Air Permitting

Illinois Environmental Protection Agency 1340 North Ninth Street Springfield, IL 62794 (217) 782-7093 Contact: Jonathan Sperry

#### Air Inspection

Illinois Environmental Protection Agency 9511 Harrison Street Des Plaines, IL 60016 (847) 294-4032 Contact: Paul Maly

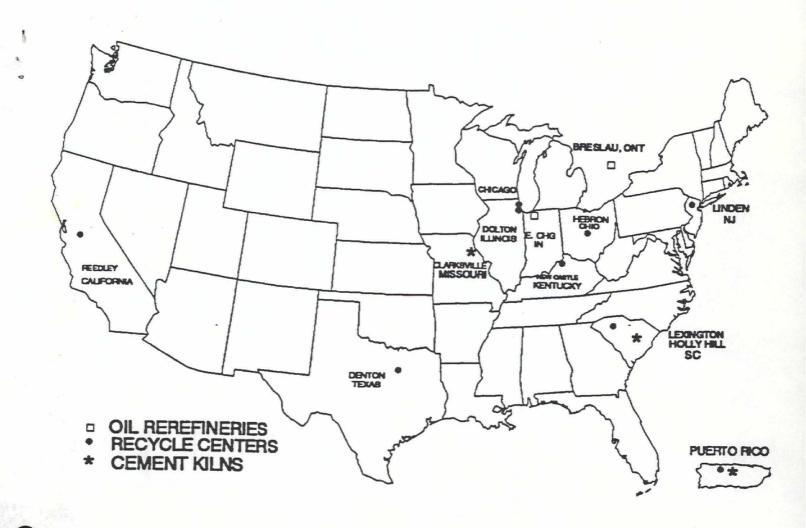
#### Water Permitting

Illinois Environmental Protection Agency 1021 North Grand Avenue East Springfield, IL 62794 (217) 782-0610 Contact: Rick Pinneo



#### **DOLTON RECYCLE CENTER**

**JANUARY, 1996** 



#### ENVIRONMENTAL INFORMATION PACKAGE

#### SAFETY-KLEEN CORP. DOLTON RECYCLE CENTER

#### General Information:

Facility Name:

Safety-Kleen Corp. Dolton RC

Location Address:

633 East 138th Street. Dolton, IL 60419

EPA ID #:

ILD980613913

Site Contact:

John Valerius, Facility Manager

Phone:

Phone:

708/849-4850

Facility Ownership:

Environmental Contact: Edward R. DeSocio, Senior Environmental Engineer

708/697-8460

Safety-Kleen Corp.

Safety-Kleen acquired the site in 1987 from McKesson Envirosystems Company. McKesson Envirosystems Company acquired the site from Barker Chemical Company in 1981. Originally, the facility was operated as a paint solvent and lacquer thinner blending plant. On September 29, 1993, the Illinois EPA issued the Part B permit for the facility and the Part B permit expires on November 3, 2003. The present operations include solvent recycling treatment and fuel blending activities. Safety-Kleen Corp. expects to operate the facility well past the year 2000.

The current operating portion of the site occupies approximately thirty acres. Attachment B to this package is a site plan for your reference.

Other Recycle Centers owned and operated by Safety-Kleen Corp. include:

Safety-Kleen Corp. Chicago, IL

EPA ID #ILD005450697

Safety-Kleen Corp. Linden. NJ

EPA ID #NJD002182897

Safety-Kleen Corp. Clayton, NJ

EPA ID #NJD069039626

Safety-Kleen Envirosystems Co. PR Manati, PR - EPA ID #PRD090399718

Safety-Kleen Corp. Denton, TX

EPA ID #TXD077603371

Safety-Kleen Corp. New Castle, KY

EPA ID #KYD053348108

Safety-Kleen Corp. Hebron, OH

EPA ID #OHD980587364

Safety-Kleen Corp. Reedley, CA

EPA ID #CAD093459485

Safety-Kleen Corp. Lexington, SC EPA ID # SCD077995488

In addition, Safety-Kleen Corp. owns and operates the following fuel blending facilities which are the sole supplier of supplemental fuel used by the respective adjacent cement manufacturing plants for energy recovery:

Safety-Kleen Corp. Clarksville Holnam/Safety-Kleen Corp. EPA ID #MOD029729688

Safety-Kleen Envirosystems Co PR-Dorado San Juan Cement Company EPA ID #PRD981182421

Safety-Kleen Corp. - Holly Hill Holnam/Safety-Kleen Corp. EPA ID #SCD003368891

Safety-Kleen also owns and operates two oil re-refining plants at the following locations:

Safety-Kleen Canada Inc. Breslau, Ontario EPA ID # NYD981178569

Safety-Kleen Oil Recovery Co. East Chicago, IN EPA ID # IND077042034

#### Regulatory Information:

Permitting Agencies: A) Illinois Environmental Protection Agency (IEPA) 2200 Churchill Road Springfield, IL 62706 217/782-6760

> B) United States Environmental Protection Agency (USEPA) Region V Waste Management Division 230 S. Dearborn Street Chicago, IL 60604 312/353-2000

The Dolton RC operates RCRA under the Part B permit. In addition, the Illinois Environmental Protection Agency administers its own Solid Waste Facility permit program. The Dolton RC operates under permit No. 1981-37-OP and supplemental permit no. 1983-143-SP.

As required by RCRA regulations (40 CFR 265) the Dolton facility maintains the following:

- Waste Analysis Plan and Records
- Inspection Log
- Contingency Plan
- Training Program and Records
- Closure Plan and Cost Estimate
- Financial Assurance for Closure

These documents are available at the facility for your inspection. Because of the volume of these documents. Safety-Kleen does not provide copies. The facility does <u>not</u> maintain a Post-Closure Plan since its Closure will remove all hazardous waste and residuals from the site.

The facility is inspected by the Illinois Environmental Protection Agency (IEPA) to assure compliance with RCRA. The site is normally found to be in compliance.

#### Process Information:

Types of Hazardous Wastes accepted:

See Attachment A

Actual acceptance of wastes are subject to the IEPA Waste Authorization Program and Safety-Kleen's Waste Pre-Qualification requirements. Wastes are received in accordance with the Waste Analysis Plan and analytical protocols. There are lab facilities on site and if necessary outside laboratories are used to supplement the facility's analytical capabilities.

#### Storage:

Per Part B Permit:

Containers

263,780 gal.

Tanks

1,315,900 gal.

#### Treatment:

The facility recycles spent solvents by gravity separation and distillation, evaporation, drying, and blending.

Treatment units generate residual waste and this material is properly utilized off-site.

The facility has approvals from the IEPA to blend non-recoverable materials into supplemental fuel to be burned for energy recovery in cement kilns. Residual waste generated from treatment units is blended into fuel. Waste solids, residual waste process water and contaminated debris are disposed of in permitted TSD facilities.

#### Site Location Information:

The facility is zoned M2, General Manufacturing, and is situated in an area of commercial, industrial and vacant land. The nearest residence is  $1/2~{\rm mile}$  from the facility.

The local terrain is flat. The geology beneath the site consists of clay soil over limestone bedrock. Information from the Illinois Dept. of Transportation, Division of Water Resources, shows that the facility is not located in areas prone to flooding during a 100-year flood.

The facility obtains its water supply from the Village of Dolton. Used water is discharged to the Metropolitan Water Reclamation District of Greater Chicago (MSDGC).

The facility is secured by various measures which include a perimeter fence, building enclosures, and limited access to controls. All process equipment is inside and the facility is manned 24 hours per day. Warning signs are posted at various locations so as to be visible from any approach and to provide adequate warning.

The site is equipped with an on-site communication system and telephones for access to off-site. Alarm systems for certain equipment, areas and storage tanks are maintained. Emergency numbers are posted for quick response to an emergency.

Fire and spill response and other safety equipment is located across the site. The facility is equipped with foam and water fire suppresent system and portable fire extinguishers are placed, marked and maintained at key locations. Spill and first aid stations on the site provide centralized access to tools, supplies and equipment for efficient emergency response. Emergency showers and eye wash stations are located in various process buildings and storage areas.

#### Insurance and Financial Information:

Liability Insurance: Safety-Kleen Corp. satisfies the requirements of 40 CFR

264.147 by having at least the following minimum

coverages.

Sudden Accidental Occurrences \$4 million per

occurrence

\$8 million aggregate

Provided by: Reliance National Indemnity

Policy #: NGA0105085-02

Safety-Kleen does not list customers as additional insureds, on its policies.

A copy of the Hazardous Waste Facility Certificate of Liability Insurance is included as Attachment C of this package.

Financial Assurance: Safety-Kleen Corp. uses a Corporate financial test to

financially assure closure of the facility and comply with the requirements of 40 CFR 264.143. Attachment D of this package is a copy of the most current financial

test package.

# Attachment A

Wastes which can be accepted and least accepted accepted and least accepted ILD980613913

| Waste No.     | Description of Hazardous Waste   |
|---------------|--|
| D001          | Solid waste that exhibits the characteristic of ignitability, but is not listed as a hazardous waste |
| D002          | Solid waste that exhibits the characteristic of corrosivity, but is not listed as a hazardous waste. |
| The following | solid wastes exhibiting the characteristic of TCLP for:  |
| D004          | Arsenic at 5.0 mg/l or more  |
| D005          | Barium at 100 mg/l or more   |
| D006          | Cadmium at 1.0 mg/l or more  |
| D <b>00</b> 7 | Chromium at 5.0 mg/l or more   |
| D008          | Lead at 5.0 mg/l or more   |
| D009          | Mercury at 0.2 mg/l or more  |
| D <b>0</b> 10 | Selenium at 1.0 mg/l or more   |
| D011          | Silver at 5.0 mg/l or more   |
| D018          | Benzene at 0.5 mg/l or greater   |
| 0019          | Carbon tetrachloride at 0.5 mg/l or greater  |
| D020          | Chlordane at 0.03 mg/l or greater  |
| D021          | Chlorobenzene at 100.0 mg/l or greater   |
| D <b>02</b> 2 | Chloroform at 6.0 mg/l or greater  |
| D023          | O-Cresol at 200 mg/l or greater  |
| 0024          | M-Cresol at 200 mg/l or greater  |
| D025          | P-Cresol at 200 mg/l or greater  |
| D026          | Cresol at 200 mg/l or greater  |
| D027          | 1,4-dichlorobenzene at 7.5 mg/l or greater   |
| D028          | 1,2-dichlorobenzene at 0.5 mg/l or greater   |

1,1-dichloroethylene at 0.7 mg/l or greater

D029

| Waste No.     | Description of Hazardous Waste   |
|---------------|--|
| D030          | 2,4-dinitrotoluene at 0.13 mg/l or greater   |
| D032          | Hexachlorobenzene at 0.13 mg/l or greater  |
| D033          | Hexachlorobenzene at 0.13 mg/l or greater  |
| D <b>034</b>  | Hexachlroethane at 3.0 mg/l or greater   |
| D035          | Methyl ethyl ketone at 200 mg/l or greater   |
| D036          | Nitrobenzene at 2.0 mg/l or greater  |
| 0037          | Pentachlorphenol at 100 mg/l or greater  |
| 0038          | Pyridine at 5.0 mg/l or greater  |
| D <b>039</b>  | tetrachlroethylene at 0.7 mg/l or greater  |
| D040          | Trichloroethylene at 0.5 mg/l or greater   |
| D041          | 2,4,5-trichlorophenol at 400 mg/l or greater   |
| D <b>04</b> 2 | 2,4,6-trichloroephenol at 2.0 mg/l or greater  |
| D043          | Vinyl chloride at 0.2 mg/l or greater  |
| F001          | The following spent halogenated solvents used in degreasing: tetrachloroethylene, trichloroethylene, methylene chloride, l,l,l-trichloroethane, carbon tetrachloride, chlorinated fluorocarbons, spent solvent mixtures/blends used in degreasing, and still bottom from the recovery of these spent solvents and spent solvent mixtures.  |
| F002          | The following spent halogenated solvents: tetrachloroethylene. methylene chloride, trichloroethylene, 1,1,1-trichloroethane, chlorobenzene, 1,1,2-trichloro-1,2,2-trifluoroethane, orthodichlorobenzene, trichlorofluoromethane, 1,1,2-trichloroethane, spent solvent mixtures and blends, and the still bottoms from the recovery of these spent solvents and spent solvent mixtures. |
| F003          | The following spent non-halogenated solvents: xylene, acetone, ethyl acetate, ethyl benzene, ethyl ether, methyl isobutyl ketone, n-buryl alcohol, cyclohexanone, methanol, spent solvent mixtures and blends, and the still bottoms from the recovery of these spent solvents and spent solvent mixtures.   |

| <u>Waste No.</u> | <u>Description of Hazardous Waste</u>   |
|------------------|---|
| F004             | The following spent non-halogenated solvents: cresols and cresylic acid, nitrobenzene, spent solvent mixtures and blends. and still bottoms from the recovery of these spent solvents and spent solvent mixtures.   |
| F005             | The following spent non-halogenated solvents: toluene, methyl ethyl ketone, carbon disulfide, isobutanol, pyridine, benzene, 2-ethoxyethanol, 2-nitropropane, spent solvent mixtures and blends, and the still bottoms from the recovery of these spent solvents and spent solvent mixtures.  |
| F006             | Wastewater treatment sludges from electroplating operations except from the following processes: (1) Sulfuric acid anodizing of aluminum; (2) tin plating on carbon steel; (3) zinc plating (segregated basis) on carbon steel; (4) aluminum or zinc-aluminum plating on carbon steel; (5) cleaning/stripping associated with tin, zinc and aluminum plating on carbon steel; and (6) chemical etching and milling of aluminum. |
| F007             | Spent cyanide plating bath solutions from electroplating operations.  |
| F008             | Plating bath residues from the bottom of plating baths from electroplating operations where cyanides are used in the process.   |
| F <b>00</b> 9    | Spent stripping and cleaning bath solutions from electroplating operations where cyanides are used in the process.  |
| F010             | Quenching bath residues from oil baths from metal heat treating operations where cyanides are used in the process.  |
| F011             | Spent cyanide solutions from salt bath pot cleaning from metal heat treating operations.  |
| F012             | Quenching waste water treatment sludges from metal heat treating operations where cyanides are used in the process.   |
| F019             | Wastewater treatment sludges from the chemical conversion coating of aluminum except from zirconium phosphating in aluminum can washing when such phosphating is an exclusive conversion coating process.   |
| F024             | Wastes, including but not limited to, distillation residues, heavy ends, tars, and reactor clean-out wastes from the production of chlorinated aliphatic hydrocarbons.  |
|                  |   |

| <u>Waste No.</u> | <u>Description of Hazardous Waste</u>   |
|------------------|---|
| F025             | Condensed light ends, spent filters and filter aids, and spent desiccant wastes from the production of certian chlorinated aliphatic hydrocarbons, be free radical catalyzed processes. These chlorinated aliphatic hydrocarbons are those having carbon chain lengths ranging from one to and including five, with varying amounts and positions of chlorine substitution. |
| F037             | Petroleum refinery primary oil/water/solids separation sludge.  |
| F038             | Petroleum refinery secondary (emulsified) oil/water/solids separation sludge.   |
| F039             | Leachate resulting from the storage, treatment or disposal of hazardous wastes.   |
| K001             | Bottom sediment sludge from the treatment of wastewaters from wood preserving processes that use creosote and/or pentachlorophenol.   |
| K002             | Wastewater treatment sludge from the production of chrome yellow and orange pigments.   |
| К003             | Wastewater treatment sludge from the production of zinc yellow pigments.  |
| K005             | Wastewater treatment sludge from the production of chrome green pigments.   |
| K006             | Wastewater treatment sludge from the production of chrom oxide green pigments (anhydrous and hydrated).   |
| K007             | Wastewater treatment sludge from the production of iron blue pigments.  |
| к008             | Oven residue from the production of chrome oxide green pigments.  |
| К009             | Distillation bottoms from the production of acetaldehyde from ethylene.   |
| K010             | Distillation side cuts from the production of acetaldehyde from ethylene.   |
| K011             | Bottom stream from the wastewater stripper in the production of acrylonitrile.  |
| K013             | Bottom stream from the acetonitrile column in the production of acrylonitrile.  |

| Waste No.     | <u>Description of Hazardous Waste</u>   |
|---------------|---|
| K014          | Bottoms from the acetonitrile purification column in the production of acrylonitrile.   |
| K016          | Heavy ends or distillation residues from the production of carbon tetrachloride.  |
| K019          | Heavy ends from the distillation of ethylene dichloride in ethylene dichloride production.  |
| K022          | Distillation bottom tars from the production of phenol/acetone from cumene.   |
| K029          | Waste from the product steam stripper in the production of 1,1,-trichloroethane.  |
| K030          | Column bottoms or heavy ends from the combined production of trichloroethylene and perchloroethylene.                                 |
| K <b>04</b> 8 | Dissolved air flotation float from the petroleum refining industry.   |
| K049          | Slop oil emulsion solids from the petroleum refining industry.  |
| K050          | Heat exchanger bundle cleaning sludge from the petroleum refining industry.   |
| K051          | API separator sludge from the petroleum refining industry.  |
| K052          | Tank bottoms (leaded) from the petroleum refining industry.   |
| K060          | Ammonia still lime sludge from cooking operations   |
| K062          | Spent pickle liquor generated by steel finishing operations of facilities within the iron and steel industry (SIC Codes 331 and 332). |
| K064          | Acid plant blowdown slurry/sludge resulting from the thickening of blowdown slurry from primary copper production.                    |
| K065          | Surface impoundment solids contained in and dredged from surface impoundments at primary lead smelting facilities.                    |
| K066          | Sludge from treatment of process wastewater and/or acid plant blowdown from primary zinc production.                                  |
| K084          | Wastewater treatment sludges generated during the production of veterinary pharmaceuticals from arsenic or organo-arsenic compounds.  |

| <u>Waste No.</u>   | Description of Hazardous Waste  |
|--|---|
| K085   | Distillation or fractionation column bottoms from the production of chlorobenzene.  |
| K086   | Solvent washes and sludges, caustic washes and sludges or water washes and sludges from cleaning tubs and equipment used in the formulation of ink from pigments, driers, soaps and stabilizers containing chromium and lead. |
| K087   | Decanter tank tar sludge from coking operations.  |
| K095   | Distillation bottoms from the production of 1,1,1-trichloroethane.  |
| К096   | Heavy ends from the heavy ends column from the production of 1,1,1-trichloroethane.   |
| K103   | Process residues from aniline extraction from the production of aniline.  |
| K104   | Combined wastewater streams generated from nitrobenzene/aniline production.   |
| K105   | Separated aqueous stream from the reactor product washing step in the production.   |
| K106   | Wastewater treatment sludge from the mercury cell process in chlorine production.   |
| K111   | Product washwaters from the production of dinitrotoluene via nitration of toluene.  |
| K112   | Reaction by-product water from the drying column in the production to toluenediamine via hydrogenation of dinitrotoluene.   |
| К117   | Wastewater from the reactor vent gas scrubber in the production of ethylene dibromide via bromination of ethane.  |
| U001<br>U002<br>U003<br>U008<br>U009<br>U019<br>U031<br>U037<br>U043<br>U044<br>U051 | Acetaldehyde Acetone Acetonitrile Acrylic Acid Acrylonitrile Benzene 1-Butanol Chlorobenzene Ethane, chloro- Chloroform Creosote  |

| <u>Waste No.</u> | Description of Hazardous Waste             |
|------------------|--|
| U052             | Cresols                                    |
| U055             | Cumene                                     |
| U056             | Cyclohexane                                |
| U <b>05</b> 7    | Cyclohexanone                              |
| U068             | Methane, dibromo-                          |
| U069             | Dibutyl phthalate                          |
| U070             | o-Dichlorobenzene                          |
| U071             | m-Dichlorobenzene                          |
| U072             | p-Dichlorobenzene                          |
| U075             | Dichlorodifluoromethane                    |
| U077             | Ethane, 1,2-dichloro                       |
| U078             | 1,1-Dichloroethylene                       |
| U079             | 1,2-Dichloroethylene                       |
| U080             | Methylene Chloride                         |
| U083             | 1,2-Dichloropropane                        |
| U084             | 1,3-Dichloropropene                        |
| U107             | Di-n-octyl phthalate                       |
| U108             | 1,4-Dioxane                                |
| U110             | Dipropylamine                              |
| U112             | Ethyl acetate                              |
| U113             | Ethyl acrylate                             |
| U117             | Ethyl ether                                |
| U118             | Ethyl methacrylate                         |
| U121             | Trichloromonofluoromethane                 |
| U125             | Furfural                                   |
| U140             | Isobutyl alcohol                           |
| U147             | Maleic Anhydride                           |
| U154<br>U159     | Methanol                                   |
| U161             | Methyl ethyl ketone Methyl isobutyl ketone |
| U162             | Methyl methacrylate                        |
| U165             | Napthalene                                 |
| U169             | Nitrobenzene                               |
| U171             | 2-Nitropropane                             |
| U188             | Phenoi                                     |
| U191             | 2-Picoline                                 |
| U196             | Pyridine                                   |
| U210             | Tetrachloroethylene                        |
| U211             | Methane, tetrachloro                       |
| U213             | Tetrahydrofuran                            |
| U220             | Toluene .                                  |
| U226             | 1,1,1-Trichloroethane                      |
| U227             | 1,1,2-Trichloroethane                      |
| U228             | Trichloroethylene                          |
| U239             | Xylene                                     |
| U359             | 2-Ethoxyethanol                            |
|                  | = · <b>y</b> ·                             |

#### Waste No. Description of Hazardous Waste

\*Non-Hazardous Chemicals and Used Oils

Automotive Crankcase Oils
Industrial Lubricating Oils
Ethylene Glycol
Propylene Glycol 2-Methyl Ether
Dimethyl Acetamide (DMAC)
N-Methyl 2-Pyrrolidone (NMP)
Monoethynolamine
Oleic Acid
N-Ethyl 2-Pyrrolidone (NEP)
Gamma, Butyrolactone (BLO)
1,4-Dioxane
Photographic and Imaging solutions
Non-hazardous 140 and 150 mineral spirits parts washer solvents
Non-hazardous aqueous parts washer solution

\*Additional Non-hazardous wastes may be accepted in accordance with condition I(B)(2) or II(B)(2).

## HAZARDOUS WASTE FACILITY CERTIFICATE OF LIABILITY INSURANCE

| Re   | eliance National Inde  |  | , , , , , ,  | 130161 . 01  | ork, New Yor   |
|--|--|--|--|--|--|
|  |  | hereby certifies th  |  |  |  |
| ınjı   | ary and property damage to   | Safety-Kleen Corp.   |  | , (the *   | 'insured"), of   |
| 100  | 00 North Randall Rd.,  | Elgin, IL 60123  | (3)<br>in connection with  | t <b>h the</b> in <b>sur</b> ed's ob   | ligation to  |
| demo   | onstrate financial responsi<br>erage applies at:   |  |  |  |  |
|  | 3. No. ILD 000805929   | _:   | Sudden Accidental <u>Occurrences</u> (6)   | Nonsudden<br>Accidental<br>Occurrences<br>(7)  | Sudden and<br>Nonsudden<br>Accidental<br>Occurrences   |
| ame  | Safety-Kleen Corp.   |  | •  |  |  |
| ddress   | 306 Campus Drive   |  |  |  | X  |
| ity  | Arlington Heights  | . IL 60004   |  |  |  |
| SEPA I   | o. No. ILD 981097819   | _  |  |  |  |
| ame  | Safety-Kleen Corp. (   | 5-160-02)  |  |  |  |
| ddress   | 20 Tucker Drive  |  |  |  | X  |
|  | Casevville, Illinois   | 62232  |  |  | ***  |
|  | ittach a separate page if m  |  | •  |  |  |
| he limi  | ts of liability are \$4  | .000.000   | 8,000,0  | 000 annual aggre   | date exclusive   |
| f legál  | defense costs. The cover   | (1) age is provided under pol  | icy number NGA01050  | 185-03 issued on   | 10/1/95  |
| f legál  | defense costs. The cover   | (%)<br>age is provided under pol   | tcy number NGA01050  | 185-03 issued on   | 10/1/95  |
| f legál  | defense costs. The cover   | (%)<br>age is provided under pol   | tcy number NGA01050  | 185-03 issued on   | 10/1/95  |
| f legál  | defense costs. The cover   | age is provided under pol<br>of said policy is   | fcy number <u>NGA01050</u><br>1/95 to 10/1/96(13   | 85-03 issued on _  | 10/1/95  |
| f legal  | defense costs. The cover   | age is provided under pol<br>of said policy is<br>the following with respec  | 10 number NGA01050<br>1/95 to 10/1/96113<br>(13)   | 85-03 issued on  | 10/1/95<br>(12)  |
| f legál<br>. The<br>(a)                                  | . The effective date   | age is provided under pol of said policy is  | icy number NGA01050 1/95 to 10/1/96(3) t to the insurance described the Insurer of thin any deductible a payment made by the I e for which coverage is   | scribed in Paragraph its obligations upplicable to the prosurer. This prov   | 10/1/95 (12)  th 1: inder the  |
| f legal . The (a)  | Insurer further certifies  Bankruptcy or insolvency policy.  The Insurer is liable for right of reimbursement by apply with respect to tha   | age is provided under pol of said policy is  | icy number NGA01050 1/95 to 10/1/9613  t to the insurance describer the Insurer of thin any deductible a payment made by the I e for which coverage in 247.  | scribed in Paragraphits obligations upplicable to the property of the property | 10/1/95 (12)  th 1: inder the indicy, with a rision does not specified in  |
| f legal  The (a) (b)                                     | Insurer further certifies  Bankruptcy or insolvency policy.  The Insurer is liable for right of reimbursement by apply with respect to that 35 Illinois Administrative whenever requested by the   | age is provided under pol of said policy is  | icy number NGA01050 1/95 to 10/1/96(1)  (13)  It to the insurance described the Insurer of the insurer of the payment made by the I e for which coverage is 247.  Environmental Protect te original of the polyment, the insured, a payment made in a payment of the hazardous   | scribed in Paragraph its obligations upplicable to the properties demonstrated as a confidence of the properties demonstrated as a confidence of the properties of the propert | 10/1/95 (12)  th 1: inder the folicy, with a rision does not specified in  the Insurer ements.  roviding taining actility will   |
| f legal  The (a) (b) (c) (d)                             | Insurer further certifies  Bankruptcy or insolvency policy.  The Insurer is liable for right of reimbursement by apply with respect to tha 35 Illinois Administrative Whenever requested by the agrees to furnish to the insurance coverage for it liability insurance on belie effective only upon write to the effective only upon write | of said policy is  | icy number NGA01050 1/95 to 10/1/96113  It to the insurance describes the Insurer of the insurer of the insurer of the for which coverage is 247.  Environmental Protect te original of the polarer, the insured, a pam having an insurable ator of the hazardous er the expiration of 6 ective only upon writt  | scribed in Paragraphists obligations with the province of the  | 10/1/95 (12)  In 1: Inder the  Inder the  Indicy, with a rision does not specified in  the Insurer ements.  roviding taining actility, will y of such                      |
| f legal  The (a) (b) (c) (d)                             | Insurer further certifies  Bankruptcy or insolvency policy.  The Insurer is liable for right of reimbursement by apply with respect to tha 35 Illinois Administrative Whenever requested by the agrees to furnish to the 6 Cancellation of the insurance coverage for it liability insurance on belie effective only upon written notice is received.  | of said policy is  | icy number NGA01050 1/95 to 10/1/96113  It to the insurance described the Insurer of the insurer of the payment made by the I e for which coverage is 247.  Environmental Protect te original of the polarer, the insured, a payment made in the polarer of the hazardous er the expiration of 6 ective only upon writt he written notice is rethe business of insurance in the business of insurance in the polarer.                        | scribed in Paragraphists obligations with the provision of the provision o | 10/1/95 (12)  In 1: Inder the  Inder the  Indicy, with a rision does not specified in  the Insurer ements.  Inviding taining actility, will y of such  after the Director. |
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THIS AGENCY IS AUTHORIZED TO REQUIRE THAT THE INSURED SUBMIT THIS DOCUMENT UNDER ILLINOIS REVISED STATUTES. 1981. CHAPTER 111 1/2 SECTION 21(F) - FAILURE 10 00 SO MAY RESULT IN A CIVIL PENALTY AGAINST THE INSURED OF NOT TO EXCEED \$25,000 PER DAY IF VIOLATION - FALSIFICATION OF THIS INFORMATION BY ANY PERSON MAY CONSTITUTE A CLASS 4 FELONY. AND MAY ALSO CARRY A FINE OF NOT TO EXCEED \$25,000 PER DAYS FOR THE FIRST OFFENSE. THIS FORM HAS BEEN APPROVED BY THE FORMS MANAGEMEN. CENTER

# THE SAFETY-KLEEN FACILITIES LISTED BELOW ARE COVERED FOR SUDDEN AND NON SUDDEN ACCIDENTAL OCCURRENCES.

ILD 005450697 Safety-Kleen Corp. (Chicago Recycle Center) 1445 West 42nd Street Chicago, Illinois 60609

ILD 980613913 and ILD 000781614 Safety-Kleen Envirosystems - Dolton 633 East 138th Street Dolton, Illinois 60419

ILD 000805911 Safety-Kleen Corp. (5-034-01/03) 1500 East Villa Street Elgin, Illinois 60120

ILD 000665869 Safety-Kleen Corp. (5-034-04) 412 Domenic Court Franklin Park, Illinois 60131

ILD 000665851 Safety-Kleen Corp. (5-034-05) 9631 West 194th Place Mokena, Illinois 60448

ILD 093862811 Safety-Kleen Corp. (5-136-01) Rural Route #3 Pekin. Illinois 60448

ILD 079749073 Safety-Kleen Corp. (5-034-01) 728 Morse Avenue Schaumburg, Illinois 60193

ILD 981088388 Safety-Kleen Corp. (5-033-01) 500 Anthony Drive Urbana, Illinois 61801



March 27, 1996

Return Receipt Requested

Director Illinois Environmental Protection Agency 2200 Churchill Road Springfield, Illinois 62706

Subject: Illinois Facilities Financial Test Letter

#### Dear Director:

Please find enclosed Safety-Kleen Corp.'s letter demonstrating financial assurance for our facilities in the State of Illinois. The figures provided to you for closure and post closure reflect the numbers from our closure plans with the proper inflation factor applied. Please note that Safety-Kleen received approval from the IEPA on February 15, 1995 that we no longer had to provide financial assurance at our Mokena branch. In July of 1995 Safety-Kleen increased financial assurance for RFI Workplans for our Urbana and Caseyville facilities.

This year we again included corrective action cost estimates into our test. Please note that the sum of current closure and post-closure cost estimates found in Alternative II, # 1 includes closure, post-closure and corrective action cost estimates as found in the attachments. There are currently eight states where there are Safety Kleen facilities that have corrective action estimates covered by the Financial Assurance Test Letter. These states are Arizona, Florida, Georgia, Idaho, Illinois, Louisiana, Nebraska and Texas.

This year Safety Kleen changed to an alternative method of financial assurance for our facilities in Oregon and Colorado; therefore, they are not included in the attachment for the Financial Assurance Test.

Other changes which decreased the financial assurance test included the approval of the USEPA and Kansas Dept. of Health on October 16, 1995 to release our Kansas City, KS facility from financial assurance requirements. We also received a letter from the State of Minnesota releasing us from financial assurance obligations at our Little Canada, MN site on May 15, 1995. Our Charlotte and High Point, NC branches both had antifreeze tanks which closed in 1995 and Safety-Kleen's EHS Manager received verbal approval from the state to decrease our financial assurance coverage at those sites. In Fargo, ND we had a new Part B become effective which decreased our closure costs in January of 1995. In August of 1995 we received approval from the State of Ohio that our Sharonville facility no longer needed to provide financial assurance. We also revised our Groveport and Tipp City closure cost estimates which decreased financial assurance was decreased by the State due to removal of all hazardous waste from storage units at that site. Our closure cost estimates in the State of Washington were also revised in January of 1996.

1000 NORTH RANDALL ROAD

**ELGIN. ILLINOIS 60123-7857** 

PHONE 708/697-8460

EAY 709/469 9500

Director March 27, 1996 Page Two

Changes which increased financial assurance coverage included an internal review of closure cost estimates at our Arizona facilities. A new container storage area was added to our Gardena, GA site. Corrective Measures were added to the Boise, ID site in January of 1996. A Part B permit modification for our East Chicago, IN facility increased closure costs. Safety-Kleen submitted a corrective action estimate to the State of Louisiana for our closed Pineville, LA branch. At our Nashville, TN facility we had increased closure costs due to operating and maintenance costs associated with groundwater remediation for closure of an UST. Safety-Kleen also updated the Closure Plan at our Chester, VA branch which increased the cost estimates.

If you have any questions or comments, please contact me at (847) 468-2228.

Sincerely,

Michille violper

Michelle R. Walper

Manager, Financial Assurance

cc: EHS Manager(s)

Environmental Affairs Manager - File III Safety-Kleen Branches - EHS File #1620

# LETTER FROM CHIEF FINANCIAL OFFICER

'Assurance of closure and/or post-closure care'

| Director'                         | •      |
|-----------------------------------|--------|
| Illinois Environmental Protection | Agency |
| 2200 Churchill Road               |        |
| Springfield, Illinois 62706       |        |

| Dear Sir or Madam:   |  |   |  |
|--|--|---|--|
| I am the chief financial officer ofSafety-Kleen Corp., 1000 Nort   |  | oad, Elgin,   | Illinois 60123   |
| This letter is in support of this firm's use of the financial test to demonstrate financial assurand/or Subpart H of 35 Illinois Administrative Code Parts 724 and 725.  | 1)<br>rance, as specified  | in Subpart H of 40 C  | FR Parts 264 and 265   |
| See Instruction (2)  |  |   |  |
| <ol> <li>This firm is the owner or operator of the following facilities for which financial as<br/>through the financial test specified in Subpart H of 35 Ill. Adm. Code Parts 724 and<br/>covered by the test are shown for each facility: (LIST ALL THE ILLINOIS FACILITY)</li> </ol>   | d 725. The current   | closure and/or post-  | closure cost estimates   |
| Total - Closure: \$11,371,500; Post-closure: \$4,193   | ,100; Corre  | ctive Action  | : \$140.300  |
| USEPA I.D. No. ILD000805929  | Closure<br>Amount  | Post-Closure Amount (5)   | Post-Closure Amounts (6)   |
| Name Arlington Heights (5-034-03C1)  |  |   |  |
| Address 306 Campus Drive   | \$322,500  | \$285,700   | \$608,200  |
| City Arlington Heights   |  |   |  |
| USEPA I.D. No. ILD981097819  |  |   |  |
| Name Caseyville (5-160-02)   |  |   |  |
| Address 20 Tucker Drive  | \$322,500  | 0   | \$342,100  |
| Address 20 Tucker Drive  |  | <del></del>   |  |
| City Caseyville  |  | rective Acti<br>\$19,600  | on:  |
| Constitution   |  |   | on:  |
| City Caseyville  | Cor<br>5 Ill. Adm. Code P<br>his firm. The curv  | \$19,600 arts Parts 724 and dent cost estimates for                                   | 725, the closure and/or<br>or closure and/or post-<br>TE GUARANTEE)                                |
| City Caseyville  Please attach a separate page if more space is needed for all facilities.  2. This firm guarantees, through the corporate guarantee specified in Subpart H of 3 post-closure care of the following facilities owned or operated by subsidiaries of t closure care so guaranteed are shown for each facility: (LIST ALL THE ILLINOIS None.  USEPA I.D. No.   | Cor<br>5 Ill. Adm. Code P<br>his firm. The curr<br>FACILITIES USI<br>Closure<br>Amount | \$19,600  arts Parts 724 and dent cost estimates for the CORPORA  Post-Closure Amount | 725, the closure and/or or closure and/or post-<br>TE GUARANTEE)  Closure and Post-Closure Amounts |
| City Caseyville  Please attach a separate page if more space is needed for all facilities.  2. This firm guarantees, through the corporate guarantee specified in Subpart H of 3 post-closure care of the following facilities owned or operated by subsidiaries of t closure care so guaranteed are shown for each facility: (LIST ALL THE ILLINOIS None.  USEPA I.D. No.   | Cor<br>IS III. Adm. Code P<br>his firm. The curn<br>FACILITIES USI<br>Closure          | \$19,600  arts Parts 724 and dent cost estimates for the CORPORA  Post-Closure        | 725, the closure and/or<br>or closure and/or post-<br>TE GUARANTEE)<br>Closure and<br>Post-Closure |
| City Caseyville  Please attach a separate page if more space is needed for all facilities.  2. This firm guarantees, through the corporate guarantee specified in Subpart H of 3 post-closure care of the following facilities owned or operated by subsidiaries of t closure care so guaranteed are shown for each facility: (LIST ALL THE ILLINOIS None.  USEPA I.D. No.  (3)                                      | Cor<br>Is Ill. Adm. Code Phis firm. The curr<br>FACILITIES USI<br>Closure<br>Amount    | \$19,600  arts Parts 724 and dent cost estimates for the CORPORA  Post-Closure Amount | 725, the closure and/or or closure and/or post-<br>TE GUARANTEE)  Closure and Post-Closure Amounts |
| City Caseyville  Please attach a separate page if more space is needed for all facilities.  2. This firm guarantees, through the corporate guarantee specified in Subpart H of 3 post-closure care of the following facilities owned or operated by subsidiaries of t closure care so guaranteed are shown for each facility: (LIST ALL THE ILLINOIS None.  USEPA I.D. No.  (3)  Name                                | Cor<br>Is Ill. Adm. Code Phis firm. The curr<br>FACILITIES USI<br>Closure<br>Amount    | \$19,600  arts Parts 724 and dent cost estimates for the CORPORA  Post-Closure Amount | 725, the closure and/or or closure and/or post-<br>TE GUARANTEE)  Closure and Post-Closure Amounts |
| City Caseyville  Please attach a separate page if more space is needed for all facilities.  2. This firm guarantees, through the corporate guarantee specified in Subpart H of 3 post-closure care of the following facilities owned or operated by subsidiaries of t closure care so guaranteed are shown for each facility: (LIST ALL THE ILLINOIS None.  USEPA I.D. No.  (3)                                      | Cor<br>Is Ill. Adm. Code Phis firm. The curr<br>FACILITIES USI<br>Closure<br>Amount    | \$19,600  arts Parts 724 and dent cost estimates for the CORPORA  Post-Closure Amount | 725, the closure and/or or closure and/or post-<br>TE GUARANTEE)  Closure and Post-Closure Amounts |
| City Caseyville  Please attach a separate page if more space is needed for all facilities.  2. This firm guarantees, through the corporate guarantee specified in Subpart H of 3 post-closure care of the following facilities owned or operated by subsidiaries of t closure care so guaranteed are shown for each facility: (LIST ALL THE ILLINOIS None.  USEPA I.D. No.  (3)  Name  Address  City                 | Cor<br>Is Ill. Adm. Code Phis firm. The curr<br>FACILITIES USI<br>Closure<br>Amount    | \$19,600  arts Parts 724 and dent cost estimates for the CORPORA  Post-Closure Amount | 725, the closure and/or or closure and/or post-<br>TE GUARANTEE)  Closure and Post-Closure Amounts |
| City Caseyville  Please attach a separate page if more space is needed for all facilities.  2. This firm guarantees, through the corporate guarantee specified in Subpart H of 3 post-closure care of the following facilities owned or operated by subsidiaries of t closure care so guaranteed are shown for each facility: (LIST ALL THE ILLINOIS None.  USEPA I.D. No.  (3)  Name  Address  City  USEPA I.D. No. | Cor<br>Is Ill. Adm. Code Phis firm. The curr<br>FACILITIES USI<br>Closure<br>Amount    | \$19,600  arts Parts 724 and dent cost estimates for the CORPORA  Post-Closure Amount | 725, the closure and/or or closure and/or post-<br>TE GUARANTEE)  Closure and Post-Closure Amounts |
| City Caseyville  Please attach a separate page if more space is needed for all facilities.  2. This firm guarantees, through the corporate guarantee specified in Subpart H of 3 post-closure care of the following facilities owned or operated by subsidiaries of t closure care so guaranteed are shown for each facility: (LIST ALL THE ILLINOIS None.  USEPA I.D. No.  (3)  Name  Address  City  USEPA I.D. No. | Cor<br>Is Ill. Adm. Code Phis firm. The curr<br>FACILITIES USI<br>Closure<br>Amount    | \$19,600  arts Parts 724 and dent cost estimates for the CORPORA  Post-Closure Amount | 725, the closure and/or or closure and/or post-<br>TE GUARANTEE)  Closure and Post-Closure Amounts |

Please attach a separate page if more space is needed for all facilities.

This Agency is authorized to require this information under Illinois Revised Statutes. 1981. Chapter 111 1/2. Section 21(f). Disclosure of this information is required. Failure to do so may result in a civil pensity not to exceed \$25,000 per day of violation. Falsification of this information may constitute a Class 4 felony, which also carries a fine of up to \$25,000 per day of violation for the first effence. This form has been approved by the Forms Management Center.

Sewrittle of Contact Service Court Treatment (Ital) (Francisco Peter Service)

#### See Instruction (10) (Letter From Chief Financial Officer)

## Alternative II

| Sum of current closure and post-closure cost estimates (total of all cost estimates shown in the four paragraphs above)  | <u>\$ 42,569</u> ,(   | 000  |
|--|---|--|
| Current bond rating of most recent issuance of this firm and name of rating service  |   |  |
| Date of issuance of bond   |   |  |
| Date of maturity of bond   | <u>September</u>  | <u> 15. 1</u>  |
| Tangible net worth (if any portion of the closure and post-closure cost estimates is included in "total liabilities" on your firm's financial statements, you may add the amount of that portion to this line) | <u> </u>  | 000  |
| Total assets in U.S. (required only if less than 90% of firm's assets are located in the U.S.)   | . <b>\$766,276,</b> 0   | 000  |
|  | Yes   | No   |
| Is line 5 at least \$10 million?   | X   | ,  |
| Is line 5 at least 6 times line 1?   | X   | /  |
| Are at least 90% of firm's assets located in the U.S.?   |   | /_ <b>Y</b>  |
| If not, complete line 10.  |   | •  |
| Is line 6 at least 6 times line 1?   | <u>X</u>  | /  |
|  | Sum of current closure and post-closure cost estimates (total of all cost estimates shown in the four paragraphs above)  Current bond rating of most recent issuance of this firm and name of rating service  Date of issuance of bond  Date of maturity of bond  Tangible net worth (if any portion of the closure and post-closure cost estimates is included in "total liabilities" on your firm's financial statements, you may add the amount of that portion to this line)  Total assets in U.S. (required only if less than 90% of firm's assets are located in the U.S.)  Is line 5 at least \$10 million?  Is line 5 at least \$10 million?  Are at least 90% of firm's assets located in the U.S.?  If not, complete line 10. | Sum of current closure and post-closure cost estimates (total of all cost estimates shown in the four paragraphs above)  Current bond rating of most recent issuance of this firm and name of rating service  BBB+ Stand and Date of issuance of bond  Date of maturity of bond  September  Tangible net worth (if any portion of the closure and post-closure cost estimates is included in "total liabilities" on your firm's financial statements, you may add the amount of that portion to this line)  \$ 306,133.  Total assets in U.S. (required only if less than 90% of firm's assets are located in the U.S.)  Yes  Is line 5 at least \$10 million?  Is line 5 at least 6 times line 1?  Are at least 90% of firm's assets located in the U.S.? |

Robert W. Willmschen, Jr.

Senior Vice President Finance and Secretary

March 15, 1996

3/04/96

SAFETY-KLEEN CORP.
COST ESTIMATES

| SITE                        | ADDRESS                                   | EPA ID               | CLOSURE      | POST CLOSURE | CORRECTIVE ACTION | TOTAL        |
|-----------------------------|---|----------------------|--------------|--------------|-------------------|--------------|
| 0-006-20<br>CH1CAGD         | 1445 W 42ND ST<br>CHICAGO, IL 60609       | 1LD005450697         | 3,114,100.00 | 494,800.00   | 0.00              | 3,608,900.00 |
| 0-006-54<br>DOLTON          | 633 E 138TH ST<br>DOLTON, IL 60419        | 1LD980613913         | 4,410,500.09 | 0.00         | 106,200.00        | 4,516,700.00 |
| 5-034-01<br>Elgin           | 1502 VILLA ST.<br>ELGIN, IL 60120         | 1LD000805911         | 2,526,200.00 | 2,715,900.00 | 0.00              | 5,242,100.00 |
| 5-034-04C1<br>Franklin Park | 450 DOMENIC CT<br>Franklin Park, IL 60131 | 1LD000665 <b>869</b> | 57,300.00    | 25,500.00    | 0.00              | 82,800.00    |
| 5-136-01<br>PEKIN           | RR 3<br>PEKIN, 1L 61554                   | 1LD093862811         | 159,400.00   | 362,300.00   | 0.00              | 521,700.00   |
| 5-034-01C1<br>Schaumburg    | 728 MORSE AVE.<br>SCHAUMBURG, IL 60193    | ILD0797490 <b>73</b> | 329,200.00   | 285,700.00   | 0.00              | 614,900.00   |
| 5-033-01<br>URBANA          | 500 W ANTHONY DR                          | ILD981088388         | 129,800.00   | 23,200.00    | 14,500.00         | 167,500.00   |

## ARTHUR ANDERSEN LLP

#### REPORT OF INDEPENDENT PUBLIC ACCOUNTANTS

To the Board of Directors and Management of Safety-Kleen Corp.:

We have audited, in accordance with generally accepted auditing standards, the consolidated financial statements of Safety-Kleen Corp. (a Wisconsin corporation) and Subsidiaries (the "Company") for the fiscal years ended December 30, 1995 and December 31, 1994, and have issued our report thereon dated February 5, 1996. We have not performed any auditing procedures since that date.

At your request, we have read the letter dated March 15, 1996, from your chief financial officer to the Environmental Protection Agency ("EPA") and compared the data therein that is specified as having been derived from the audited consolidated financial statements for the year ended December 30, 1995, referred to above, with the corresponding amounts in those financial statements. In connection with this procedure, no matters came to our attention that caused us to believe that the specified data should be adjusted.

This report is furnished solely for the use of the Company and the EPA and should not be used for any other purpose.

athers andersen IIP

Chicago, Illinois, March 15, 1996

### ARTHUR ANDERSEN I LP

#### REPORT OF INDEPENDENT PUBLIC ACCOUNTANTS

To the Board of Directors and Shareholders of Safety-Kleen Corp.

We have audited the consolidated balance sheets of Safety-Kleen Corp. (a Wisconsin corporation) and Subsidiaries as of December 30, 1995 and December 31, 1994, and the related consolidated statements of operations, shareholders' equity and cash flows for each of the three fiscal years in the period ended December 30, 1995, not included herein. These financial statements are the responsibility of the Company's management. Our responsibility is to express an opinion on these financial statements based on our audits.

We conducted our audits in accordance with generally accepted auditing standards. Those standards require that we plan and perform the audit to obtain reasonable assurance about whether the financial statements are free of material misstatement. An audit includes examining on a test basis, evidence supporting the amounts and disclosures in the financial statements. An audit also includes assessing the accounting principles used and significant estimates made by management, as well as evaluating the overall financial statement presentation. We believe that our audits provide a reasonable basis for our opinion.

In our opinion, the financial statements referred to above present fairly, in all material respects, the financial position of Safety-Kleen Corp. and Subsidiaries as of December 30, 1995 and December 31, 1994, and the results of their operations and their cash flows for each of the three fiscal years in the period ended December 30, 1995, in conformity with generally accepted accounting principles.

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Chicago, Illinois, February 5, 1996

#### REPORTO2(R2)

3/13/96

# SAFETY-KLEEN CORP. COST ESTIMATES

| SITE                    | ADDDRESS                                    | EPA ID       | CLOSURE    | POST CLOSURE | ACTION     |
|-------------------------|---|--------------|------------|--------------|------------|
| 6-063-01<br>FORT SMITH  | 2511 JOHNSON ST<br>FORT SMITH, AR 72904     | ARD000709733 | 68,800.00  | 25,600.00    | 0.00       |
| 6-086-01<br>LITTLE ROCK | 11727 ARCH ST PIKE<br>LITTLE ROCK, AR 72206 | ARD054575238 | 64,600.00  | 23,700.00    | 391,000.00 |
|                         |   | AR TOTALS:   | 133,400.00 | 49,300.00    | 391,000.00 |

3/13/96

| SITE                             | ADDDRESS  | EPA ID               | CLOSURE    | POST CLOSURE       | CORRECTIVE<br>ACTION |
|----------------------------------|---|----------------------|------------|--------------------|----------------------|
| 3-130-01C1<br>ALTAMONTE SPGS     | 505 PLUNOSA DR<br>ALTAMONTE SPGS, FL 32701        | FLD <b>097837983</b> | 173,900.00 | 526,100.00         | 0.00                 |
| 3-097-01<br>Boynton Beach        | 5610 ALPHA DRIVE<br>BOYNTON BEACH, FL 33426       | FLD984167791         | 43,900.00  | 0.00               | 0.00                 |
| 3-097-01C1<br>DELRAY BEACH       | 16086 SW 4TH AVE BLDG B<br>DELRAY BEACH, FL 33447 | FLD000776757         | 330,800.00 | 1,052,900.00       | 0.00                 |
| 3-097-02<br>MEDLEY               | 8755 NW 95TH ST.<br>MEDLEY, FL 33178              | FLD984171694         | 63,400.00  | 0.00               | 0.00                 |
| 3-097-02C1<br>MIAMI              | 7875 NORTHWEST 54TH ST<br>MIAMI, FL 33166         | FLD980840086         | 64,700.00  | 1,575,600.00       | 0.00                 |
| 3-079-01<br>Orange Park          | 161 INDUSTRIAL LOOP S<br>ORANGE PARK, FL 32073    | FLD980847214         | 76,400.00  | 0.00               | 0.00                 |
| 3-163-02<br>Port Charlotte       | 19200 PEACHLAND BLVD<br>PORT CHARLOTTE, FL 33949  | FLD000776716         | 27,300.00  | 0.00               | 0.00                 |
| 3-130-01<br>Sanford              | 600 CENTRAL PARK DR<br>SANFORD, FL 32771          | FLD984171165         | 51,700.00  | 0.00               | 0.00                 |
| 3-079-02<br>Tallaha <b>s</b> see | 4426 ENTREPOT BLVD.<br>TALLAHASSEE, FL 32310      | FLD982133159         | 53,900.00  | 0.00               | 0.00                 |
| 3-079-02C1<br>FALLAHASSEE        | 3082 W THARPE ST(REAR) TALLAHASSEE, FL 32303      | FLD000776773         | 85,100.00  | <b>572,30</b> 0.00 | <b>367,50</b> 0.00   |
| S-163-01<br>FAMPA                | 5309 24TH AVE S<br>TAMPA, FL 33619                | FLD980847271         | 150,100.00 | 0.00               | 0.00                 |
| 5-163-01C1<br>(AMPA              | 4701 N MANHATTAN<br>TAMPA, FL 33614               | FLD049557408         | 441,400.00 | 870,300.00         | 389,400.00           |

3/13/96

| SITE                    | ADDDRESS                                       | EPA 10       | CLOSURE    | POST CLOSURE | CORRECTIVE<br>ACTION |
|-------------------------|--|--------------|------------|--------------|----------------------|
| 3-106-01<br>COLUMBUS    | 5920 COCA COLA BLVD<br>COLUMBUS, GA 31909      | GAD000823096 | 32,800.00  | 0.00         | 26,400.00            |
| 3-179-21<br>Garden City | 5217 AUGUSTA RD<br>GARDEN CITY, GA 31408       | GAD000776781 | 39,500.00  | 0.00         | 0.00                 |
| 3-013-01C1<br>HAPEVILLE | 3440 LANG AVE<br>HAPEVILLE, GA 30354           | GAD000823070 | 120,700.00 | 583,900.00   | 0.00                 |
| 3-106-21<br>Macon       | 6580 HAWKINSVILLE RD<br>MACON, GA 31206        | GAD980709257 | 30,800.00  | 0.00         | 0.00                 |
| 3-013-01<br>MORROW      | 7027 COMMERCIAL DR.<br>MORROW, GA 30260        | GAD981265424 | 69,900.00  | 0.00         | 0.00                 |
| 3-013-02<br>Norcross    | 4800 S OLD PEACH TREE RD<br>NORCROSS, GA 30071 | GAD980842777 | 85,100.00  | 0.00         | 354,700.00           |
|                         |  | GA TOTALS:   | 378,800.00 | 583,900.00   | 381,100.00           |

3/13/96

| SITE       | ADDDRESS            | EPA ID       | CLOSURE   | POST CLOSURE | CORRECTIVE<br>ACTION |
|------------|---------------------|--------------|-----------|--------------|----------------------|
| 1-183-08   | 6334 SUPPLY WAY     | IDD981770498 | 53,000.00 | 0.00         | 0.00                 |
| BOISE      | BOISE, 10 83705     |              |           |              |                      |
| 1-183-08C1 | 514 E 45TH ST       | 100000712026 | 28,300.00 | ,0.00        | 112,300.00           |
| BOISE      | BOISE, ID 83714     |              |           |              |                      |
| 1-183-28C1 | 2610 GARRETTWAY     | IDD991281270 | 0.00      | 0.00         | 0.00                 |
| POCATELLO  | POCATELLO, ID 83201 |              |           |              | •                    |
|            |                     |              |           |              |                      |
|            |                     | ID TOTALS:   | 81,300.00 | 0.00         | 112,300.00           |

3/13/96

| SITE                       | ADDDRESS   | EPA 1D       | CLOSURE      | POST CLOSURE | CORRECTIVE<br>ACTION |
|----------------------------|--|--------------|--------------|--------------|----------------------|
| 0-006-10<br>EAST CHICAGO   | 601 RILEY ROAD<br>EAST CHICAGO, IN 46312           | IND077042034 | 969,400.00   | 0.00         | 0.00                 |
| 5-060-01<br>Evansville     | 4417 ST JOE ST<br>EVANSVILLE, IN 47712             | IND000815894 | 0.00         | 0.00         | 0.00                 |
| 5-068-01<br>FT WAYNE       | 21:12 PRODUCTION RD<br>FT MAYNE, IN 46808          | IND000715466 | 79,000.00    | 0.00         | 0.00                 |
| 4-076-02<br>GREENWOOD      | 475 PARK 800 DR. GREENWOOD, IN 46143               | IMD984874776 | 0.00         | 0.00         | 0.00                 |
| 4-076-02C1<br>Indianapolis | 8418-24-26 BROOKVILLE RD<br>INDIANAPOLIS, IN 46239 | 1MD000815886 | 47,300.00    | 0.00         | 0.00                 |
| 5-034-06C1<br>PORTAGE      | 6050 EAGLE AVE<br>PORTAGE, IN 46368                | 1MD000714428 | 85,800.00    | 0.00         | 0.00                 |
| 5-082-01<br>SOUTH BEND     | 2217 WESTERN AVEN<br>SOUTH BEND, IN 46628          | 1MD000715474 | 197,200.00   | 0.00         | 0.00                 |
|                            |  | IN TOTALS:   | 1,378,700.00 | 0.00         | 0.00                 |

3/13/96

| SITE                  | ADDDRESS                             | EPA ID       | CLOSURE    | POST CLOSURE | CORRECT I VE<br>ACTION |
|-----------------------|--------------------------------------|--------------|------------|--------------|------------------------|
| 4-075-01              | 12092 VIRGINIA AVE                   | KYD981027451 | 160,800.00 | 0.00         | 0.00                   |
| ASHLAND               | ASHLAND, KY 41102                    | K10701021431 | 100,000.00 | 0.00         | 0.00                   |
| 4-075-01C1<br>ASHLAND | 1592 MOLOHAN DR<br>ASHLAND, KY 41101 | KYD000776724 | 160,800.00 | 1,339,690.00 | 0.00                   |
| NONLINE               | ASILAND, KI TIIDI                    |              |            |              |                        |
| 4-090-01              | 550 BLUESKY PRKWY                    | KYD981027469 | 59,000.00  | 0.00         | 0.00                   |
| LEXINGTON             | LEXINGTON, KY 40509                  |              |            |              | •                      |
| 4-091-01C1            | 751 GRADE LANE                       | KYD091514653 | 173,600.00 | 278,700.00   | 0.00                   |
| LOUISVILLE            | LOUISVILLE, KY 40213                 |              |            |              |                        |
| 0-006-58              | 3700 LAGRANGE RD                     | KYD053348108 | 443,100.00 | 105,300.00   | 0.00                   |
| NEW CASTLE            | NEW CASTLE, KY 40068                 |              | -          | -            |                        |
|                       |                                      |              |            |              |                        |
|                       |                                      | KY TOTALS:   | 997,300.00 | 1,723,600.00 | 0.00                   |

3/13/96

| SITE              | ADDDRESS                                 | EPA ID       | CLOSURE   | POST CLOSURE | CORRECTIVE<br>ACTION |
|-------------------|--|--------------|-----------|--------------|----------------------|
| 2-011-01<br>LEEOS | RT 202 RFD 3 BOX 1990<br>LEEDS, ME 04263 | MED980667810 | 54,700.00 | 0.00         | 0.00                 |
|                   |  | ME TOTALS:   | 54,700.00 | 0.00         | 0.00                 |

### SAFETY-KLEEN CORP. COST ESTIMATES IN THE STATE OF MS

| SITE      | ADDRESS             | EPA ID       | CLOSURE    | POST CLOSURE | CORRECTIVE ACTION |
|-----------|---------------------|--------------|------------|--------------|-------------------|
| 6-078-01  | 120 RICHARDSON DR   | MSD000776765 | 54,000.00  | 0.00         | 0.00              |
| JACKSON   | JACKSON, MS 39209   |              |            |              |                   |
| 6-094-01  | 7217 AIRWAYS RD     | MSD981030984 | 89,400.00  | 0.00         | 0.00              |
| SOUTHAVEN | SOUTHAVEN, MS 38671 |              |            |              |                   |
|           |                     |              |            |              |                   |
|           |                     |              | 143,400.00 | 0.00         | 0.00              |

3/13/96

| SITE                 | ADDORESS                                       | EPA ID       | CLOSURE   | POST CLOSURE | ACTION |
|----------------------|--|--------------|-----------|--------------|--------|
| 1-183-23<br>BISMARCK | 3704 SARATOGA AVE UNIT E<br>BISMARCK, ND 58501 | NDD980957070 | 30,600.00 | 0.00         | 0.00   |
| 1-183-03<br>FARGO    | 1537 1/2 FIRST AVE S<br>FARGO, NO 58103        | NDD000716738 | 30,400.00 | 0.00         | 9.00   |
|                      |  | ND TOTALS:   | 61,000.00 | 0.00         | 0.00   |

3/13/96

| SITE                             | ADDDRESS                                 | EPA ID       | CLOSURE    | POST CLOSURE | CORRECTIVE<br>ACTION |
|----------------------------------|--|--------------|------------|--------------|----------------------|
| 7-008-01<br>Al <b>buque</b> rque | 2720 GIRARD NE<br>ALBUQUERQUE, NM 87107  | NMD000804294 | 69,000.00  | 0.00         | 0.00                 |
| 7-008-21<br>FARMINGTON           | 4200A HAWKINS RD<br>FARMINGTON, NM 87401 | NMD980698849 | 49,400.00  | 0.00         | 0.00                 |
|                                  |  | NM TOTALS:   | 118,400.00 | 0.00         | 0.00                 |

3/13/96

| •                       |   |              |            |              | CORRECTIVE |
|-------------------------|---|--------------|------------|--------------|------------|
| SITE                    | ADDDRESS  | EPA ID       | CLOSURE    | POST CLOSURE | ACTION     |
| 4-040-02<br>BRUMSWICK   | 1169 INDUSTRIAL PARKWAY<br>BRUNSWICK, OH 44212        | OHD000720987 | 47,300.00  | 0.00         | 0.00       |
| 4-046-01<br>GROVEPORT   | 4465 MARKETING PL<br>GROVEPORT, OH 43125              | ОНD981000664 | 41,500.00  | 0.00         | 0.00       |
| 4-037-01C1<br>HAMILTON  | 4579 PORT UNION RD<br>HAMILTON, OH 45011              | OHD084750579 | 189,800.00 | 0.00         | 0.00       |
| 0-006-42<br>HEBRON      | 581 MILLIKEN DR SE<br>HEBRON, OH 43025                | OKD980587364 | 927,600.00 | 395,100.00   | 0.00       |
| 4-040-03<br>KENT        | 354 PORTAGE BLVD<br>KENT, OH 44240                    | OHD981099401 | 54,500.00  | 0.00         | 0.00       |
| 4-190-01C1<br>OREGON    | 161 N LALLENDORF<br>OREGON, OH 43616                  | ОНФ000721001 | 84,100.00  | 0.00         | 0.00       |
| 4-037-01<br>Sharonville | 11919 TRÁMHAY DR<br>SHARONVILLE, OH 45241             | онр981187313 | 0.00       | 0.00         | 0.00       |
| 4-040-03C1<br>Tallmadge | 2929 NOGADORE RD<br>TALLMADGE, OH 44278               | OHD000720136 | 127,800.00 | 0.00         | 0.00       |
| 4-037-02<br>TIPP CITY   | 4205 LISA DR<br>TIPP CITY, OH 45371                   | ОНD980683155 | 54,700.00  | 0.00         | 0.00       |
| 4-190-01<br>(OLEDO      | 5148 TRACTOR RD<br>TOLEDO, OH 43612                   | OHD981097876 | 46,100.00  | 0.00         | 0.00       |
| 040-01C1                | 26309 MILES RD UNIT M1 WARRENSVILLE HEIGHTS, ON 44128 | ОНФ000810275 | 156,600.00 | 0.00         | 0.00       |
| 196-01<br>'CUNGSTOLN    | 1171 1/2 N MERIDIAN RD<br>YOUNGSTONN, ON 44509        | оно960990162 | 55,900.00  | 0.00         | 0.00       |

3/13/96

| SITE                        | ADDDRESS                                  | EPA ID       | CLOSURE    | POST CLOSURE | CORRECTIVE<br>ACTION |
|-----------------------------|---|--------------|------------|--------------|----------------------|
| 6-124-01C1<br>OKLAHOMA CITY | 2827 W LINDLEY<br>OKLAHOMA CITY, OK 73107 | OKD000829507 | 92,200.00  | 0.00         | 0.00                 |
| 6-193-01<br>Tulsa           | 16319 E MARSHALL ST<br>TULSA, OK 74116    | око000763821 | 99,400.00  | 0.00         | 0.00                 |
| 6-124-01<br>WHEATLAND       | 7825 STATE HWY 152<br>WHEATLAND, OK 73097 | OKD980878474 | 50,700.00  | 0.00         | 0.00                 |
|                             |   | OK TOTALS:   | 242,300.00 | 0.00         | 0.00                 |

3/13/96

| SITE                    | ADDDRESS                                     | EPA ID       | CLOSURE     | POST CLOSURE | ACTION |
|-------------------------|--|--------------|-------------|--------------|--------|
| 1-183-05<br>SIOUX FALLS | 2000 N WESTPORT AVE<br>SIGUX FALLS, SD 57107 | SDD000716696 | 41,900.00   | 0.00         | 0.00   |
| •                       |  |              | *********** | ,            |        |
|                         |  | SD TOTALS:   | 41,900.00   | 0.00         | 0.00   |

3/13/96

| SITE                       | ADDDRESS  | EPA 1D               | CLOSURE      | POST CLOSURE | CORRECTIVE<br>ACTION |
|----------------------------|---|----------------------|--------------|--------------|----------------------|
| 6-002-01<br>ABILENE        | 4234 OIL BELT LANE<br>ABILENE, TX 79605         | 1ж062287883          | 78,200.00    | 24,900.00    | 0.00                 |
| 6-009-02<br>AMARTILLO      | 3811 INTERSTATE 40 E<br>AMARILLO, TX 79104      | тж0000747410         | 69,300.00    | 24,700.00    | 0.00                 |
| 6-048-01<br>CORPUS CHRISTI | 3820 BRATTON RD<br>CORPUS CHRISTI, TX 78413     | ТХФ000747402         | 51,600.00    | 0.00         | 0.00                 |
| 0-006-18<br>DENTON         | 1722 COOPER CREEK ROAD<br>DENTON, TX 76208      | ТХФ077603371         | 1,135,600.00 | 107,500:00   | 0.00                 |
| 6-056-01<br>El Paso        | 900 A HAWKINS BLVD<br>EL PASO, TX 79915         | ТХФ000747394         | 90,900.00    | 23,600.00    | 0.00                 |
| 6-049-02<br>FORT WORTH     | 6529 MIDWAY RD<br>FORT WORTH, TX 76117          | TXD981053416         | 106,600.00   | 0.00         | 0.00                 |
| 6-049-01<br>IRVING         | 2130 E GRAUMYLER<br>IRVING, TX 75061            | TXD981052061         | 122,900.00   | 0.00         | 0.00                 |
| 6-194-01<br>Longvieu       | 202 MICHAEL PL<br>LONGVIEW, TX 75602            | тж0000 <b>747378</b> | 53,700.00    | 0.00         | 0.00                 |
| .6-009-01<br>LUBBOCK       | 1610 REDWOOD ST.<br>LUBBOCK, TX 79408           | тж0000747436         | 41,700.00    | 0.00         | 0.00                 |
| 5-048-02<br>4C ALLEN       | 1311 E TAMARACK<br>MC ALLEN, TX 78501           | ТХФ083145656         | 55,600.00    | 0.00         | 0.00                 |
| >-002-02<br>11DLAND        | 10607 NER 127<br>MIDLAND, TX 79711              | TXD981056690         | 98,300.00    | 0.00         | 0.00                 |
| 5-073-02<br>Itssourt CITY  | 1580 INDUSTRIAL ROAD<br>MISSOURI CITY, TX 77459 | TXD010803203         | 221,600.00   | 198,800.00   | 561,200.00           |

3/13/96

| SITE           | ADDDRESS                 | EPA ID       | CLOSURE                                 | POST CLOSURE | ACTION |
|----------------|--------------------------|--------------|---|--------------|--------|
| 7-166-01       | 1066 S PIONEER RD        | UTD980957088 | 57,000.00                               | 0.00         | 0.00   |
| SALT LAKE CITY | SALT LAKE CITY, UT 84104 |              |   |              |        |
| 7-166-0101     | 394 IRONHOOD DR          | UTD052430741 | 55,900.00                               | 0.00         | 0.00   |
| SALT LAKE CITY | SALT LAKE CITY, UT 84115 | •            |   | ,            |        |
|                |                          |              | *************************************** |              |        |
|                |                          | UT TOTALS:   | 112,900.00                              | 0.00         | . 0.00 |

3/13/96

| SITE              | ADDDRESS                          | EPA 1D       | CLOSURE    | POST: CLOSURE | CORRECTIVE |
|-------------------|-----------------------------------|--------------|------------|---------------|------------|
| 2-105-01<br>Barre | 23 W SECOND ST<br>BARRE, VT 05641 | VTD000791699 | 208,600.00 | 0.00          | 0.00       |
|                   |                                   | VT TOTALS:   | 208,600.00 | 0.00          | 0.00       |

SAFETY-KLEEN CORP. COST ESTIMATE EHS MANAGER SIGNATURE: (EDWARD DESOCIO) SITE CITY: DOLTON LOCATION CODE: 0-006-54 EPA ID: ILD980613913 This document updates the cost estimates for inflation in accordance with 40 CFR 265.142(b) and 40 CFR 264.142(b). The 1995 inflation factor is 2.4 percent. YEAR: 1995 CORRECTIONS CLOSURE COST: 4,307,100.00 CONTINGENT CLOSURE COST:
POST CLOSURE COST: 0.00 0.00 CONTIGHT POST CLSURE COST: 0.00 PARTIAL CLOSURE COST: 0.00 103,700.00 CORRECTIVE ACTION: YEAR: 1996 **CORRECTIONS** CLOSURE COST:
CONTINGENT CLOSURE COST:
POST CLOSURE COST:
CONTNGNT POST CLSURE COST: 4,410,500.00 0.00 0.00

0.00

0.00

106,200.00

**COMMENTS:** 

File: Facility EHS File #1610

PARTIAL CLOSURE COST:

CORRECTIVE ACTION:

M. Walper

EHS Manager File

REM File

Mary A. Gade, Director

217/524-3300 P435 100 793 September 29, 1993 2200 Churchill Road

GCT 0 1 1993

Environmental Department

Safety-Kleen Corporation 777 Big Timber Road Elgin, Illinois 60123 SAFETY-KLEEN CORP.
Safety-Kleen Envirosystems Company
633 East 138th Street
Dolton, Illinois 60419

Re: 0310690006 -- Cook County Safety-Kleen Envirosystems

ILD980613913 Part B Log No. 120

RCRA Part B -- Administrative Record

#### Gentlemen:

Enclosed is a RCRA Hazardous Waste Management Part B permit. The final permit decision is based on the administrative record contained in the Agency's files. The contents of the administrative record are described in 35 Illinois Administrative Code (IAC) Section 705.211.

This permit is divided into two permits: A RCRA hazardous waste management permit issued by IEPA and a HSWA Hazardous Waste Management Permit issued by USEPA. The USEPA permit generally contains only those provisions and conditions raised pursuant to the Hazardous and Solid Waste Amendments of 1984 to RCRA (HSWA). The IEPA permit also enforces portions of HSWA where IEPA has authority to do so. Read both documents carefully, failure to meet any portion of either permit could result in significant civil and/or criminal penalties.

Within 35 days after the notification of a final permit decision, the permittee may petition the Illinois Pollution Control Board to contest the issuance of the permit. The petition shall include a statement of the reasons supporting a review, including demonstration that any issues raised in the petition, were previously raised during the public comment period. In all other respects the petition shall be in accordance with the requirements for permit appeals as set forth in 35 I.A.C. Part 105. Nothing in this paragraph is intended to restrict appeal rights under Section 40(b) of the Environmental Protection Act (35 I.A.C. 705.212(a)). If you intend to appeal the USEPA issued permit, contact USEPA -- Region V concerning the appeal procedures.

Petitions for review of the USEPA decision must be submitted within 30 days after service of notice of the final USEPA permit decision. Any person who filed comments on the draft permit or participated in the public hearing may petition the Environmental Appeals Board to review any condition of the permit decision. Any person who failed to file comments or failed to participate in the public hearing on the draft permit may petition the Environmental Appeals Board to review only to the extent of the changes from the draft to the final permit decision. The procedures for permit appeals on the USEPA portion of the permit armsfound in 40 CFR 124.19.

A copy of the Agency's response to significant comments on the draft permit will be mailed today under separate cover.

If you have any questions concerning this permit, please contact Ted Dragovich, P.E. If you intend to seek review of the USEPA issued permit, please contact USEPA -- Region V Eda Lam at 312/353-4889 concerning the applicable review procedures.

Very truly yours,

Lawrence W. Easter, P.E., Manager Law Dure
Permit Section

Permit Section

Division of Land Pollution Control

Bureau of Land

LWE:TD:sf/sp/219Y, 1-2

Attachments: Permit

cc: USEPA Region V, George Hamper

Mary A. Gade, Director

(

2200 Churchill Road, Springfield, IL 62794-9276

RCRA Log 120 Part B

#### ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

#### HAZARDOUS WASTE MANAGEMENT RCRA PART B PERMIT

IEPA #0310690006 -- Cook
USEPA ILD #980613913
Safety-Kleen Enviro Systems
Permit Log 120
RCRA -- Part B - Administrative Record

Effective Date: November 3, 1993 Expiration Date: November 3, 2003

Safety-Kleen Corporation 777 Big Timber Road Elgin, Illinois 60123 Safety-Kleen Enviro Systems 633 East 138th Street Dolton, Illinois 60419

A Part 8 permit is hereby proposed pursuant to the Resource Conservation and Recovery Act, Illinois Environmental Protection Act, and Title 35 Illinois Administrative Code (I.A.C.) parts 702, 703, 705, and 720 through 729 to Safety-Kleen to maintain and operate a waste management facility involved in the treatment and storage of hazardous waste. Safety-Kleen Enviro System is located at 633 East 138th Street in Dolton, Illinois.

This permit consists of the conditions contained herein (including those in any attachments and appendices) and applicable regulations contained in the Illinois Environmental Protection Act and Title 35 I.A.C. Parts 702, 703, 705 and 720 through 729 in effect on the effective date of this permit. The Environmental Protection Act (Ill. Rev. Stat., Chapter Ill 1/2, Section 1039) grants the Illinois Environmental Protection Agency the authority to impose conditions on permits which is issued. This Permit contains 142 pages including attachments A through J.

If you have any questions regarding this permit, please contact Ted Dragovich, P.E., at 217/524-3306.

Lawrence W. Eastep, P.E., Manager

Permit Section

Division of Land Pollution Control

LWE: 10: Sf/sp/219Y,3

cc: USEPA Region 5



# UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION V HAZARDOUS WASTE MANAGEMENT PERMIT

| Name of Permittee: | Safety-Kleen Corp. Dolton Recycle / Service Center                        |
|--------------------|---|
| Facility Location: | Street Address: 633 East 138th Street City, State: Dolton, Illinois 60419 |
| EPA Identification | Number: <u>ILD 980 613 913</u>  |
| Effective Date:    | Movember 3, 1993  |
| Expiration Date:   | November 3, 2003  |

### **Authorized Activities:**

Pursuant to the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act (RCRA) of 1976, and the Hazardous and Solid Waste Amendments (HSWA) of 1984 (42 U.S.C. \$6901, et seq.), and regulations promulgated thereunder by the United States Environmental Protection Agency (U.S. EPA) (codified in Title 40 of the Code of Federal Regulations (40 CFR)), Federal permit conditions (hereinafter called the permit) of the RCRA permit are issued to Safety Kleen Corp. (hereinafter called the Permittee), for the facility located in Dolton, Illinois.

The RCRA permit contains both the effective Federal permit conditions (contained herein) and the effective State permit conditions issued by the State of Illinois RCRA program authorized under 40 CFR Part 271 (hereinafter called the State permit). When both this permit and the State permit are effective, the Permittee has an effective RCRA permit which authorizes the Permittee to conduct hazardous waste management activities as specified in the RCRA permit.

#### Permit Approval:

On January 31, 1986, the State of Illinois received final authorization pursuant to Section 3006 of RCRA, 42 U.S.C. \$6926, and 40 CFR Part 271, to administer the pre-HSWA RCRA hazardous waste program. On April 30, 1990, the State of Illinois also received authorization to administer certain specific portions of the hazardous waste program required under HSWA. Because the State of Illinois has not yet received authorization to administer the entire hazardous waste program requirements of HSWA, certain permit conditions must be issued by the U.S. EPA to address these requirements. These conditions are contained in this permit.

The Permittee must comply with all terms and conditions of this permit. This permit consists of the conditions contained herein (including those in any attachments) and the applicable regulations contained in 40 CFR Parts 260, 261, 262, 264, 266, 268, 270, and 124, and applicable provisions of HSWA.



This permit is based on the assumption that the information submitted in the permit application, dated February 1, 1991, and in any subsequent amendments (hereinafter referred to as the application), is accurate. Any inaccuracies found in this information may be grounds for the termination, revocation and reissuance, or modification of this permit (see 40 CFR 270.41, 270.42 and 270.43) and potential enforcement action. The Permittee must inform the U.S. EPA of any deviation from or changes in the information in the submitted application as soon as the Permittee becomes aware of such deviation or changes.

### Opportunity to Appeal:

Petitions for review must be submitted within 30 days after service of notice of the final permit decision. Any person who filed comments on the draft permit or participated in the public hearing may petition the Environmental Appeals Board to review any condition of the permit decision. Any person who failed to file comments or failed to participate in the public hearing on the draft permit may petition for administrative review only to the extent of the changes from the draft to the final permit decision. The procedures for permit appeals are found in 40 CFR 124.19.

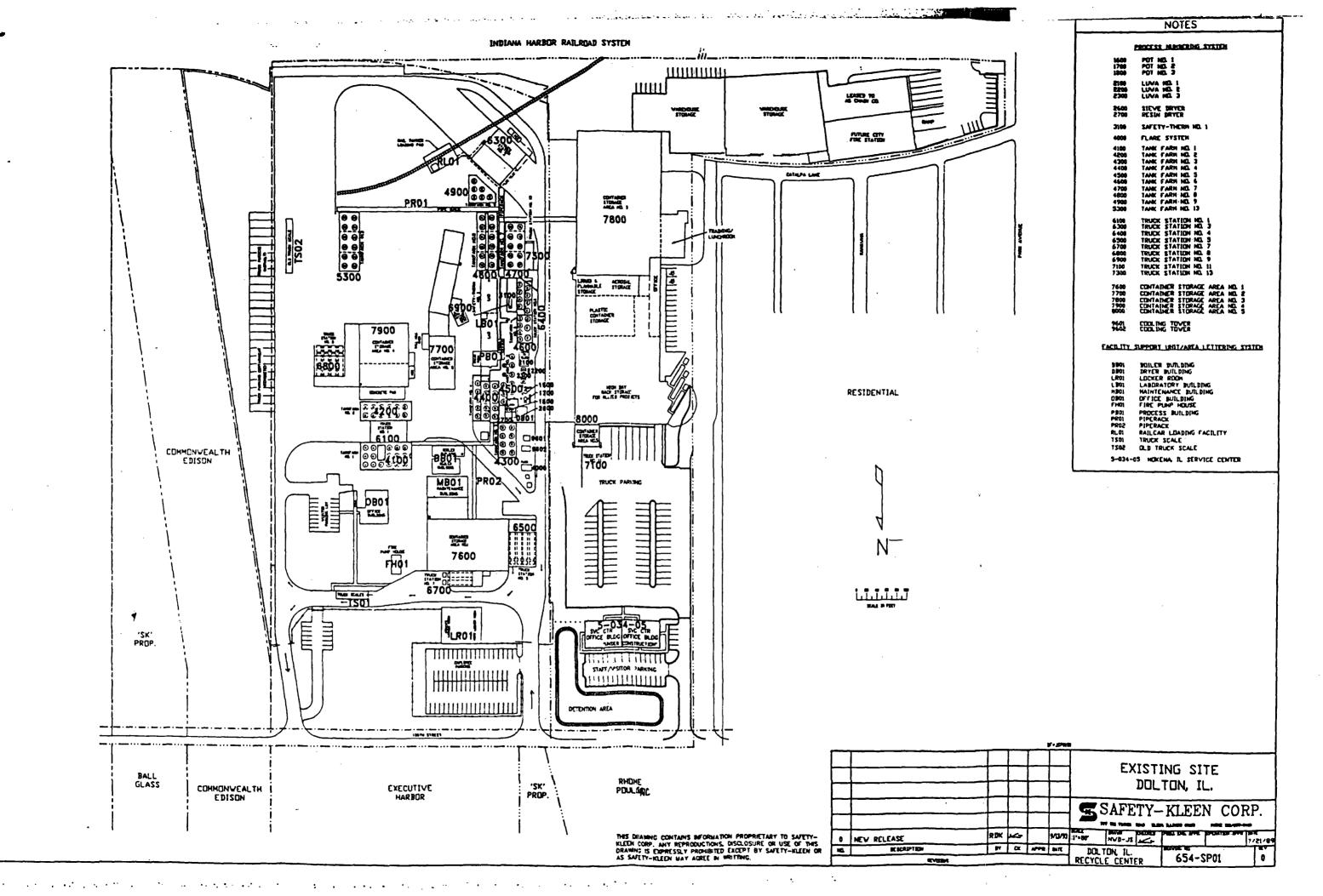
### **Effective Date:**

The RCRA permit is effective when both this permit and the State permit are effective. This permit is effective as of the effective date specified on the previous page, unless a review is requested under 40 CFR 124.19. The permit shall remain in effect until the expiration date, unless revoked and reissued, or terminated (40 CFR 270.41 and 270.43), or continued in accordance with 40 CFR 270.51.

| Bv:   | Norman Thidyson                                 |
|-------|---|
| -, -, | Norman R. Medermano                             |
|       | Norman R. Medergang Associate Division Director |
|       | Office of RCRA                                  |
|       | Waste Management Division                       |

Date: 9/24/93







### Safety-Kleen - The Dolton Facility

Safety-Kleen, as the world's largest recycler of the cleaning solvents used every day in automotive and industrial businesses, is committed to utilizing its unique marketing, distribution and reclamation capabilities to properly and safely manage hazardous materials both in the U.S. and around the world.

Safety-Kleen is aggressively expanding into related environmental services, including imaging services--photochemical recovery and recycling. This extension of waste generator services, which have been the company's area of expertise since it was founded in 1968, is of benefit to over 400,000 photochemical-using facilities nationwide.

As a corporation, Safety-Kleen believes that responsible and appropriate disposal methods,--including recycling, re-refining of used oil, and energy recovery with minimum incineration--are the most environmentally beneficial ways to handle the hazardous portion of the global waste stream.

The Company annually provides over six million services to recover fluids for about 400,000 hazardous waste producers throughout the world. In addition, in 1994, Safety-Kleen extended its lines of business to include imaging services. The Company is committed to properly managing these materials, as well as serving customers by helping them to comply with federal and state laws that regulate their use and disposal.

### An Overview of the Dolton Recycle Center

The Dolton Recycle Center, located at 633 East 138th Street in Dolton, is a Safety-Kleen facility for the recycling and recovery of used solvents and fluids for reuse. Recycling serves to conserve resources, and helps protect the environment by reducing the amount of potentially harmful chemicals that need to be disposed.

The original plant was constructed by Barker Chemical, and in 1981, McKesson Envirosystems Company purchased it for use as a hazardous waste recycling facility. Safety-Kleen Corp. acquired it in March, 1987, and has invested heavily in improved design and construction to assure utilization of the best available technologies for safe and efficient reclamation of fluids. The Dolton Recycle Center is located on 29 acres.

The Dolton facility supports Safety-Kleen operations in Illinois and other Midwestern states, recovering spent cleaning fluids in the automotive repair, auto body painting, chemical, electronic, plastic and metal finishing industries.

In keeping with Safety-Kleen's stringent adherence to environmental safety regulations, the Dolton Recycle Center operates under permits issued by the U.S. EPA and Illinois EPA. It does not accept radioactive, infectious, biological, explosive or reactive wastes and no waste material remains at the facility. While the materials are at the Dolton facility they are stored in sealed drums and above-ground tanks.

The Dolton Recycle Center is secured by perimeter fencing with electronic gates, has building enclosures and is manned 24 hours a day. A state-of-the-art foam fire protection system at the site assures a quick response to any possible fire, thereby protecting employees and the surrounding community.

All Safety-Kleen employees at the Dolton location participate in an ongoing training program designed to maintain peak operational efficiency and a high degree of preparation for the unlikely event of an emergency. Currently, there are 97 employees at the Dolton facility. The Dolton Recycle Center is very active in the community. John Valerius, manager of the facility, is a member of the Board of the Dorchester Foundation. The Center is a member of the Dolton Chamber of Commerce and donates regularly to a variety of area non-profit groups, including The New Hope Center. Additionally, the facility sponsors local amateur sports teams and is a strong supporter of the Dolton Fire Department.

Safety-Kleen welcomes all members of the community to visit the recycle center and conducts occasional open house tours. For more information about facility tours, open houses, facility operations or Safety-Kleen, please write John Valerius, Manager, Dolton Recycle Center, Safety-Kleen Corp., 633 East 138th Street, P.O. Box 100, Dolton, IL 60419, or call at (708) 849-4850.

#### A Commitment To Excellence

The Dolton Recycle Center has been among Safety-Kleen's best performing facilities. It is committed to 100% compliance on safety and environmental issues. A firm commitment awareness has been essential to its growth.

### The Waste Recovery Process

Safety-Kleen has developed many innovative concepts and techniques in waste collection and recovery that are used throughout its recycling processes.

Prior to scheduling many waste shipments, Safety-Kleen samples the potential customer's waste material to determine whether the waste can be safely handled by the company, is within the parameters of the company's waste handling permits and to ascertain how the material can best be processed.

Once a customer relationship has been established, the waste stream ideally stays constant, thus making the material easier to process after the first shipment.

All the material picked up is sent to one of the company's recycle centers throughout the country. This is done on a timely basis, with pickups done weekly.

### A Comprehensive Network

Safety-Kleen has a unique network of facilities to collect waste from its customers and recycle it for re-use. The company's network of 178 branch service centers in the U.S. and Canada, and 58 international branches is the key to serving the needs of its global customers.

The company's reclamation facilities include 11 recycle centers, two used oil refineries and four fuel blending operations. These facilities make it possible for Safety-Kleen to "close the loop" in meeting its customers' requirements for the re-use of materials.

Although the majority of Safety-Kleen's customers are small-quantity generators of hazardous waste fluids, cleaning solvents from larger-quantity producers are also accepted by the company, and are either recycled and returned to these customers, or sold to other customers after recycling. In addition, the company collects and re-refines used motor and lubricating oil, reclaiming it for use as a high-quality base lube stock, or giving it new life in another application.

4/96